

UNIT

U.S. COURT OF APPEALS

RT

NORTHERN

Seventh Circuit
Loose Pleadings

IS, EASTERN DIVISION

UNITED STATES OF AMERICA

Vol 1 of 2

v.

CRIMINAL COMPLAINT

JAMES VALENCIA aka "Jota" and "Father,"
KELLY JONES aka "Bone" and "Miguel,"
CARLOS JIRON aka "Lucho" and "Luis,"
JESUS ABEL ROLDAN aka "Tomatiko"
DAVID ACEVEDO,
WILLIAM ANTHONY MORCIGLIO aka "Woody,"
MARCUS JONES aka "Titty" and "T,"
DANIEL C. MALDONADO,
ANGEL GEORGE MELENDEZ, JR.,
NATHAN THOMAS aka "Edwin Garcia,"
DIANA MUNOZ,
YOLANDA RIVERA,
IRIS D. TORRES,
RUBEN CHAPARRO-RAMOS,
MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo,"
VIBENCIO CONSUEGRA,
SHANTELL HILL,
RICARDO ARNOLD aka "Ricky" and "Chino,"
MIGUEL SANCHEZ aka "Mikey,"
MILENA P. PUPO aka "Paisa" and "Paisita,"
LUIS E. RIVERA aka "Tito,"
JUAN LOZADA aka "Mono", "Monito" and "Pablito,"
SANDRA P. VELAZQUEZ aka "La Negra" and "Negrita,"
COSME CHACON aka "Meno" and "Nano,"
VIVIANA HERNANDEZ,

CASE NUMBER:

MAGISTRATE JUDGE BROWN

02CR1051

06-2562

DOCKETED
NOV 04 2002

FILED

OCT 29 2002

MICHAEL W. DOBBINS
CLERK, U.S. DISTRICT COURT

I, the undersigned complainant being duly sworn state the following is true and correct to the best of my knowledge and belief. On or about November 1999 to the present, in Cook county, in the Northern District of Illinois defendant(s) did, (Track Statutory Language of Offense)

See Attachment A.

in violation of Title See Attachment A United States Code, Section(s) See Attachment A. I further state that I am a(n) Special Agent, U.S. Customs and that this complaint is based on the following facts:

See Attached Affidavit.

Continued on the attached sheet and made a part hereof: X Yes No



06-2562-L01

Colberd Almeida, U.S. ~~U.S. CA~~ 7th Circuit
Signature of Complainant

FILED

Sworn to before me and subscribed in my presence,

JUN 08 2006 DP

October 29, 2002
Date

at Chicago, Illinois
City and State

GINO J. AGNELLO
CLERK

DOC. #

Geraldine Soat Brown, U.S. Magistrate Judge
Name & Title of Judicial Officer

Geraldine Soat Brown
Signature of Judicial Officer

ATTACHMENT A

A. Defendants JAMES VALENCIA aka "Jota" and "Father," KELLY JONES aka "Bone" and "Miguel," CARLOS JIRON aka "Lucho" and "Luis," JESUS ABEL ROLDAN aka "Tomatico" DAVID ACEVEDO, WILLIAM ANTHONY MORCIGLIO aka "Woody," MARCUS JONES aka "Titty" and "T," DANIEL C. MALDONADO, ANGEL GEORGE MELENDEZ, JR., NATHAN THOMAS aka "Edwin Garcia," DIANA MUNOZ, YOLANDA RIVERA, IRIS D. TORRES, RUBEN CHAPARRO-RAMOS, MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo," VIBENCIO CONSUEGRA, SHANTELL HILL, RICARDO ARNOLD aka "Ricky" and "Chino," MIGUEL SANCHEZ aka "Mikey," MILENA P. PUPO aka "Paiza" and "Paizita," LUIS E. RIVERA aka "Tito," JUAN LOZADA aka "Mono", "Monito" and "Pablito," SANDRA P. VELAZQUEZ aka "La Negra" and "Negrita,"

between in or about late 1999 to the present, conspired and agreed with each other and with others known and unknown to possess with intent to distribute and distribute a controlled substance, namely, in excess of one kilogram of heroin, in violation of Title 21, United States Code, Section 846 and with aiding and abetting said conspiracy, in violation of Title 18, United States Code, Section 2.

B. Defendants, JAMES VALENCIA aka "Jota" and "Father," KELLY JONES aka "Bone" and "Miguel," CARLOS JIRON aka "Lucho" and "Luis," MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo," COSME CHACON aka "Meno" and "Nano," and VIVIANA HERNANDEZ,

between in or about June of 2002 to the present, did conspire and agree with each other and with others known and unknown to conduct and attempt to conduct financial transactions involving proceeds of a specified unlawful activity, namely the distribution of controlled substances, knowing that the property involved in the activity and that the transactions were designed, in whole or in part to conceal and disguise the nature, the location, the source, the ownership, and the control of the proceeds of the specified unlawful activity, in violation of Title 18, United States Code, Section 1956(h).

STATE OF ILLINOIS)
)
COUNTY OF COOK)

AFFIDAVIT

I, Colberd Almeida, being first duly sworn on oath, depose and state as follows:

I. PRELIMINARY MATTERS

1. I am a Special Agent of the United States Customs Service (Customs) and have been so employed for approximately one year and five months. I have been involved in various types of electronic surveillance and in the debriefing of defendants, witnesses, informants, and others who have knowledge of the illegal distribution and transportation of controlled substances.

2. This affidavit is made in support of a criminal complaint charging (a) that between in or about late 1999 to the present, the following individuals conspired and agreed with each other and with others known and unknown to possess with intent to distribute and distribute a controlled substance, namely, in excess of one kilogram of heroin, in violation of Title 21, United States Code, Section 846 and with aiding and abetting said conspiracy, in violation of Title 18, United States Code, Section 2:

JAMES VALENCIA also known as "Jota" and "Father,"
KELLY JONES aka "Bone" and "Miguel,"
CARLOS JIRON aka "Lucho" and "Luis,"
JESUS ABEL ROLDAN aka "Tomatico"
DAVID ACEVEDO,
WILLIAM ANTHONY MORCIGLIO aka "Woody,"
MARCUS JONES aka "Titty" and "T,"
DANIEL C. MALDONADO,

ANGEL GEORGE MELENDEZ, JR.,
NATHAN THOMAS aka "Edwin Garcia,"
DIANA MUNOZ,
YOLANDA RIVERA,
IRIS D. TORRES,
RUBEN CHAPARRO-RAMOS,
MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo,"
VIBENCIO CONSUEGRA,
SHANTELL HILL,
RICARDO ARNOLD aka "Ricky" and "Chino,"
MIGUEL SANCHEZ aka "Mikey,"
MILENA P. PUPO aka "Paisa" and "Paisita,"
LUIS E. RIVERA aka "Tito,"
JUAN LOZADA aka "Mono", "Monito" and "Pablito,"
SANDRA P. VELAZQUEZ aka "La Negra" and "Negrita,"

and (b) that between in or about June 2002 to the present,
the following individuals conspired and agreed with each other and
with others known and unknown to commit money laundering, in
violation of Title 18, United States Code, Section 1956(h):

JAMES VALENCIA also known as "Jota" and "Father,"
KELLY JONES aka "Bone" and "Miguel,"
CARLOS JIRON aka "Lucho" and "Luis,"
MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo,"
COSME CHACON aka "Meno" and "Nano"
VIVIANA HERNANDEZ

3. This affidavit is also made in support of a warrant to
search the residence of KELLY JONES located at 1433 W. Warner, Unit
#2, Chicago, Illinois and seize certain evidence relating to the
commission of violations of the above-stated criminal offenses.

4. I have received special training in all aspects of the
enforcement of laws concerning controlled substances as found in
Title 21 of the United States Code ("U.S.C."), including but not
limited to, the authorized interception of wire communications, the

use of pen registers, undercover operations, various types of surveillance, debriefing of defendants, witnesses, and informants having knowledge of the distribution and transportation of controlled substances, and the laundering and concealing of proceeds from drug trafficking.

5. As a Customs Special Agent, I have participated in numerous drug trafficking investigations, and have participated in investigations relating to the illegal distribution of controlled substances. Based on my training and experience, I am familiar with the ways in which drug traffickers and their associates conduct their drug-related business, including, but not limited to, their methods of distributing narcotics, their use of telephones, and their use of codes and code words to identify themselves, and the nature of the communications.

6. As a result of my participation in this investigation, my interviews with and review of reports prepared by agents in Customs as well as other federal agencies and other law enforcement agents and officers, I am familiar with all aspects of this investigation as described in this affidavit. The information contained in this affidavit includes the results of physical surveillances; agents' interviews of witnesses; agents' review of recordings of consensually-recorded conversations and conversations intercepted pursuant to Court orders; and review of statements of witnesses. Since this affidavit is being submitted for the limited purposes of

establishing probable cause to arrest the individuals identified above and to search the premises identified above, I have not included each and every fact known to me concerning this investigation.

7. Based on the information contained in this affidavit, I submit that there is probable cause to believe (a) that between in or about late 1999 to the present, the following individuals conspired and agreed with each other and with others known and unknown to possess with intent to distribute and distribute a controlled substance, namely, in excess of one kilogram of heroin, in violation of Title 21, United States Code, Section 846 and with aiding and abetting said conspiracy, in violation of Title 18, United States Code, Section 2:

JAMES VALENCIA also known as "Jota" and "Father,"
KELLY JONES aka "Bone" and "Miguel,"
CARLOS JIRON aka "Lucho" and "Luis,"
JESUS ABEL ROLDAN aka "Tomatico"
DAVID ACEVEDO,
WILLIAM ANTHONY MORCIGLIO aka "Woody,"
MARCUS JONES aka "Titty" and "T,"
DANIEL C. MALDONADO,
ANGEL GEORGE MELENDEZ, JR.,
NATHAN THOMAS aka "Edwin Garcia,"
DIANA MUNOZ,
YOLANDA RIVERA,
IRIS D. TORRES,
RUBEN CHAPARRO-RAMOS,
MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo,"
VIBENCIO CONSUEGRA,
SHANTELL HILL,
RICARDO ARNOLD aka "Ricky" and "Chino,"
MIGUEL SANCHEZ aka "Mikey,"
MILENA P. PUPO aka "Paisa" and "Paisita,"
LUIS E. RIVERA aka "Tito,"
JUAN LOZADA aka "Mono", "Monito" and "Pablito,"

SANDRA P. VELAZQUEZ aka "La Negra" and "Negrita,"

and (b) that between in or about June 2002 to the present, the following individuals conspired and agreed with each other and with others known and unknown to commit money laundering, in violation of Title 18, United States Code, Section 1956(h):

JAMES VALENCIA also known as "Jota" and "Father,"
KELLY JONES aka "Bone" and "Miguel,"
CARLOS JIRON aka "Lucho" and "Luis,"
MARTHA LLANOS aka "Martica",, "La Mona", and "Pie Malo,"
COSME CHACON aka "Meno" and "Nano"
VIVIANA HERNANDEZ

8. Based on my training and experience and discussions with other experienced law enforcement officers, I know that wholesale drug traffickers regularly keep the following items at places within their control, including their residences, for extended periods of time:

- a. Controlled substances;
- b. Drug paraphernalia, including scales, cutting supplies, and packaging;
- c. Weapons and ammunition;
- d. Cash, jewelry, and precious metals;
- e. Records of drug sales, including ledgers and tally sheets;
- f. Financial information and statements, books, records, receipts, cash disbursement journals, computers, discs, software, safe deposit box keys, bank statements, tax returns and other records related to the receipt, expenditure and concealment or other disposition of income.

II. OVERVIEW OF THE CONSPIRACY

9. Since in or about December 2001, Customs has conducted an investigation concerning the drug trafficking and related activities of JAMES VALENCIA and other individuals working with and

on behalf of VALENICA, including drug suppliers, distributors, customers, and couriers.

10. This investigation has revealed that VALENICA heads a large-scale drug organization that distributes multi-kilogram quantities of heroin in various cities in the United States, including Chicago, Illinois, New York City and Miami, Florida (the "VALENCIA organization"). At the direction of VALENCIA, high-level members of the VALENCIA organization coordinate the interstate delivery of large quantities of heroin to Chicago and elsewhere, as well as the delivery of drug proceeds to various wire remitter businesses in Chicago and to members of the organization located outside of Chicago. These high-level members, including VALENCIA, KELLY JONES, CARLOS JIRON, and JESUS A. ROLDAN, communicate with each other by telephone to coordinate these deliveries of heroin and drug proceeds. The high-level members typically send drug couriers from Chicago to these other cities to meet with and receive heroin shipments from members of the organization who are stationed in these cities. The drug couriers, who often deliver drug proceeds to their co-conspirators in these other cities, pick up the heroin shipment and transport the shipments of heroin back to Chicago, usually by car or bus. After the heroin arrives in Chicago, the drugs are typically brought to a "lab," which is a location where members of the organization process and prepare the heroin for further distribution to members of the conspiracy,

including MARTHA LLANOS, VIBENCIO CONSUEGRA, SHANTELL HILL, RICARDO ARNOLD, MIGUEL SANCHEZ, MILENA PUPO, LUIS RIVERA, JUAN LOZADA, SANDRA P. VELAZQUEZ, and others, who in turn distribute the heroin to customers.

11. This investigation has revealed the following about the roles of the defendants in the VALENCIA organization:

A. Organizers/Leaders

a. **JAMES VALENCIA** aka "Father" and "Jota," heads the VALENCIA heroin organization and operates the organization from South America.¹

b. **KELLY JONES** aka "Bone" and "Miguel" is an organizer and leader of the Chicago-area cell of the VALENCIA heroin organization who distributed large quantities of heroin to members of the conspiracy and others.² Since June of 2002, various telephones used by **KELLY JONES**, including **Target Phones I, II, III,**

¹As described in this affidavit, beginning on June 14, 2002, Customs began intercepting wire communications over telephones used by KELLY JONES, and later over telephones used by CARLOS JIRON aka "Lucho." Prior to the initiation of this wire tap, two members of the organization, NATHAN THOMAS and Source of Information 1 ("SOI 1"), had provided information to Customs that VALENCIA was the leader of this heroin organization and that they believed he was living in South America. NATHAN THOMAS provided Customs agents with a photograph of JAMES VALENCIA, which Customs compared with photographs contained in JAMES VALENCIA's Immigration & Naturalization Service (INS) records. Based on Customs' comparison of these photographs, they were of the same person, JAMES VALENCIA.

²During the wire interception investigation, Customs identified KELLY JONES through surveillance, among other means.

and VIII, were the subjects of court-authorized wire interceptions.

c. **CARLOS JIRON** aka "Lucho" and "Luis" is an organizer and leader of the Chicago-area cell of the VALENCIA heroin organization who distributed large quantities of heroin to members of the conspiracy and others.³ Since August of 2002, various telephones used by **CARLOS JIRON**, including **Target PHones IV, V, VI, VII, IX and X**, were the subjects of court-authorized wire interceptions.

d. **JESUS ABEL ROLDAN** aka "Tomatico" is an organizer and leader of the Miami, Florida area cell of the VALENCIA heroin organization who distributed large quantities of heroin to members of the conspiracy and others.⁴

B. Couriers

e. **DAVID ACEVEDO** assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for distribution to others.⁵

³During the wire interception investigation, law enforcement conducted a car stop on this individual and identified him as **CARLOS JIRON**. Moreover, he was observed during surveillance.

⁴During the wire interception investigation, law enforcement conducted surveillance of this individual in Florida and Chicago. On or about October 28, 2002, agents conducted surveillance on this individual, and based on Florida driver's license records, identified this individual as **JESUS ABEL ROLDAN**.

⁵During the wire interception investigation, this individual was identified as **DAVID ACEVEDO** during a traffic stop by Chicago

f. **WILLIAM ANTHONY MORCIGLIO** aka "Woody," assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for distribution to others.⁶

g. **MARCUS JONES** aka "Titty" and "T," assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for distribution to others.⁷

h. **DANIEL C. MALDONADO**, assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for distribution to others.⁸

i. **ANGEL GEORGE MELENDEZ, JR.**, assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for

Police Department and on surveillance.

⁶During the wire interception investigation, this individual was identified through a photograph contained in his California criminal records and on surveillance.

⁷During the wire interception investigation, this individual was identified through telephone records, driver's license records, and on surveillance.

⁸During the wire interception investigation, this individual was identified on surveillance and when law enforcement officers conducted a car stop on a vehicle and identified this person as "Daniel C. Maldonado".

distribution to others.⁹

j. **NATHAN THOMAS** aka "Edwin Garcia," assisted in the VALENCIA heroin organization by, among other things, transporting heroin from other cities to Chicago, Illinois for distribution to others.¹⁰

k. **DIANA MUNOZ**, assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for distribution to others.¹¹

l. **YOLANDA RIVERA**, assisted in the VALENCIA heroin organization by, among other things, transporting wholesale heroin from other cities to Chicago, Illinois for distribution to others.¹²

m. **IRIS D. TORRES**, assisted in the VALENCIA heroin organization by, among other things, meeting with couriers of the

⁹During the wire interception investigation, this individual was identified on surveillance and when an officer conducted a traffic stop of a vehicle driven by this individual and identified him as Angel George Melendez, Jr.

¹⁰As described in this affidavit, this individual was, at one point, cooperating with law enforcement. However, soon after the wire interception investigation began, THOMAS stopped cooperating with law enforcement and later on participated in the conspiracy by transporting a heroin shipment from Florida to Chicago for KELLY JONES.

¹¹As described in this affidavit, MUNOZ was identified by law enforcement while waiting at Midway Airport in Chicago, Illinois. She was also identified on surveillance.

¹²During the wire interception investigation, this individual was identified through driver's license records and surveillance.

organization who had transported wholesale quantities of heroin to Chicago, obtaining the heroin from these couriers in Chicago, and then delivering the heroin to CARLOS JIRON for further distribution.¹³

n. **RUBEN CHAPARRO-RAMOS**, assisted in the VALENCIA heroin organization by, among other things, transporting wholesale quantities of heroin from other cities to Chicago, Illinois for further distribution.¹⁴

C. Chicago-Based Heroin Distributors

o. **MARTHA LLANOS** aka "Martica", "La Mona", and "Pie Malo," is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **KELLY JONES** and **CARLOS JIRON**, for purposes of further distribution of the heroin to others. **LLANOS** also received proceeds from the sale of heroin ("drug proceeds") from members of the VALENCIA heroin organization and laundered the proceeds through her various wire remitter businesses.¹⁵

¹³During the wire interception investigation, this individual was identified through driver's license records and surveillance.

¹⁴During the wire interception investigation, this individual was identified through driver's license records and surveillance, as well as hotel records.

¹⁵During the wire interception investigation, this individual was identified by surveillance, telephone records, and Secretary of State records.

p. **VIBENCIO CONSUEGRA**, is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from KELLY JONES and CARLOS JIRON, for purposes of further distribution of the heroin to others.¹⁶

q. **SHANTELL HILL**, is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **KELLY JONES**, for purposes of further distribution of the heroin to others.¹⁷

r. **RICARDO ARNOLD** aka "Ricky" and "Chino," is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **KELLY JONES**, for purposes of further distribution of the heroin to others.¹⁸

s. **MIGUEL SANCHEZ** aka "Mikey," is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **KELLY JONES**, for purposes of further distribution of the heroin to others.¹⁹

¹⁶During the wire interception investigation, this individual was identified through his arrest record and surveillance.

¹⁷During the wire interception investigation, this individual was identified through surveillance, a traffic stop, and arrest records.

¹⁸During the wire interception investigation, this individual was identified through surveillance and Secretary of State records.

¹⁹During the wire interception investigation, this individual was identified through a traffic stop by Chicago

t. **MILENA P. PUPO** ²⁰ aka "Paisa" and "Paisita" and **LUIS E. RIVERA** ²¹ aka "Tito," are members of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **KELLY JONES** and **CARLOS JIRON**, for purposes of further distribution of the heroin to others. The investigation indicates that PUPO is the wife of LUIS E. RIVERA, and that they both work together in the distribution of drugs.

v. **JUAN LOZADA** aka "Mono", "Monito" and "Pablito," is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **CARLOS JIRON**, for purposes of further distribution of the heroin to others. ²²

w. **SANDRA P. VELAZQUEZ** aka "La Negra" and "Negrita," is a member of the VALENCIA heroin organization who obtained wholesale quantities of heroin on a regular basis from **KELLY JONES** and **CARLOS JIRON**, for purposes of further distribution of the heroin to

Police Department.

²⁰During the wire interception investigation, this person was identified through surveillance and a driver's license photograph.

²¹During the wire interception investigation, this individual was identified through surveillance and Secretary of State records.

²²During the wire interception investigation, this individual was identified through surveillance and a traffic stop, as well as Secretary of State records.

others.²³

D. Launderers of Drug Proceeds

x. **COSME CHACON**²⁴ aka "Meno" and "Nano" and **VIVIANA HERNANDEZ**²⁵ are members of the VALENCIA heroin organization who received drug proceeds from members of the organization and laundered those proceeds through a wire remitter business, which CHACON and HERNANDEZ, believed to be his wife, operate.

III. PROBABLE CAUSE

A. Historical Information

12. Before the wiretap phase of this investigation began on June 14, 2002, NATHAN THOMAS was cooperating with law enforcement. During this period of cooperation, THOMAS provided credible historical information about the VALENCIA organization.²⁶ THOMAS had personally participated in numerous interstate shipments of heroin for the organization, and had consensually recorded telephone conversations with KELLY JONES concerning heroin

²³During the wire interception investigation, this individual was identified through a traffic stop and surveillance.

²⁴During the wire interception investigation, this individual was identified through telephone records and [FBI CW.]

²⁵During the wire interception investigation, this individual was identified through surveillance and SOS records, [AND FBI CW]

²⁶However, soon after the initiation of the wire tap, THOMAS stopped cooperating and afterwards assisted the organization as a drug courier.

trafficking over **Target Phone I**, and overheard JONES' end of conversations relating to narcotics trafficking over **Target Phone II**. THOMAS has identified, among other individuals, JAMES VALENCIA as the head of the VALENCIA organization who resides in Colombia, South America; KELLY JONES as the head of the Chicago-based cell of the organization; MARCUS JONES as an individual who packages the heroin for distribution for the organization; DAVID ACEVEDO as an individual who packages the heroin for the organization; SHANTELL HILL as a customer of the organization; "CONSUEGRA" (VIBENCIO CONSUEGRA) as a customer of the organization; "PAISA" (MILENA PUPO) as someone believed to be a customer of the organization; as well as members of the organization in New York, Florida, California, and Michigan.

13. THOMAS has been arrested in Illinois at least twenty-six times, and has four convictions. THOMAS has one arrest in the state of Florida for the charge of Unlawfully Engaging in the Business of Money Transmissions, which charge is still pending in Florida.

14. THOMAS began cooperating after he was arrested in Mississippi on January 25, 2002 following a traffic stop and consent search of his vehicle that resulted in the seizure of approximately fourteen grams of marijuana and \$5,000.00 cash. When he was arrested, THOMAS said that he was traveling to New Orleans, Louisiana, to pick up heroin for the VALENCIA organization

and bring the heroin to KELLY JONES in Chicago. The State of Mississippi had agreed not to prosecute THOMAS based on his arrest on January 25, 2002, so long as he cooperated with Mississippi state authorities and federal authorities in their investigation.

15. From at least February 7, 2002 until May 2002, THOMAS had provided multiple post-arrest statements to Customs about the VALENCIA organization and his personal involvement in the organization. During this time period, THOMAS made and received several consensually-recorded telephone calls to and from KELLY JONES on **Target Phone I**. No promises were made to THOMAS concerning the statements he made to Customs about the VALENCIA organization. THOMAS was told that his statements to Customs about his role in the VALENCIA organization exposed him to substantial criminal liability. At the time of his cooperation, THOMAS was cooperating in the hope that his cooperation would result in lesser charges and/or a reduced sentence. THOMAS had also received \$4,000.00 in payment for information furnished to Customs.

16. Before THOMAS's period of cooperation with Customs, THOMAS had purchased a false social security card and birth certificate, and obtained a driver's license using the false documents to obtain a new name. THOMAS' stated purpose for using the new name was to attempt to get out of the drug business.

17. During THOMAS's period of cooperation with Customs, Customs agents instructed THOMAS to report any contact or communications he had with either KELLY JONES or JAMES VALENCIA.

During this period, it was discovered that THOMAS had contacts with KELLY JONES which were not reported to Customs. When confronted by agents with these unreported contacts, THOMAS admitted to these contacts.²⁷

18. After the wiretap investigation began, THOMAS stopped cooperating with law enforcement. In particular, THOMAS failed to accurately disclose to Customs his communications with KELLY JONES and he refused to follow the instructions of Customs. Moreover, as described later in this affidavit, THOMAS and YOLANDA RIVERA drove to Florida to pick up heroin and brought it back to KELLY JONES, even though THOMAS was specifically instructed by Customs on several occasions that he was not to participate in any drug-related activity.

19. Your Affiant believes that the information provided by

²⁷According to THOMAS, one of the contacts he had with KELLY JONES (which he did not report to Customs) was on April 30, 2002, when he was with KELLY JONES when JONES met with SHANTELL HILL. JONES asked THOMAS to approach the vehicle of HILL and obtain money from him. THOMAS received a quantity of currency from HILL, that HILL reported to be \$2,705.00. THOMAS gave the currency to JONES. THOMAS stated that he believed this money was payment for heroin, since HILL at one time used to be a heroin customer of THOMAS. In addition, THOMAS stated that earlier that same day, THOMAS and KELLY JONES went in JONES' Navigator to a house that according to THOMAS, a male who THOMAS knows only as "Consuegro" [VIBENCIO CONSUEGRA] resides. While at that house, JONES exited the vehicle and went into the house. After some time elapsed, JONES came back out of the house and entered the vehicle, and later that day drove to meet the male on the motorcycle. According to THOMAS, in his past trips to New York on behalf of the organization, THOMAS has seen "Consuegro" (VIBENCIO CONSUEGRA) in New York. According to THOMAS, KELLY JONES told THOMAS that "Consuegro" (CONSUEGRA) is one of his heroin customers.

THOMAS is reliable. THOMAS's post-arrest statements implicated him in criminal conduct and were made against his penal interest. A substantial portion of the information provided by THOMAS concerning the organization has been corroborated by consensual tape recordings, physical surveillance, travel records, and telephone records, and intercepted conversations during the wire interception investigation described below. The information provided by THOMAS about the VALENCIA heroin organization is based on both first-hand knowledge and/or from individuals with first hand knowledge of the events referred to.

20. THOMAS advised law enforcement agents that he had been involved with the VALENCIA drug organization since November 1999. THOMAS stated that he had transported between 50 and 100 kilograms of heroin into the Chicago, Illinois area and transported more than one million dollars in currency. Based on his personal involvement with the organization, he has learned that JAMES VALENCIA is the head of the organization and has heroin distribution organizations in various United States cities, including Chicago, Illinois. According to THOMAS, he has traveled to New York, Fort Lauderdale, Detroit, Los Angeles, and New Orleans to traffic narcotics on behalf of the organization. According to THOMAS, KELLY JONES oversees the Chicago cell of the organization and has done so since January 2001. THOMAS provided Customs with photographs of JAMES VALENCIA, which depicted the same individual in photographs contained in VALENCIA's INS alien file.

21. According to THOMAS, the VALENCIA organization smuggles multi-kilogram quantities of heroin from various United States cities, to include New York, New Orleans and Ft. Lauderdale, into the Chicago area. Once the heroin is in Chicago, it is broken down and packaged into street level distribution quantities and distributed by members of the VALENCIA organization. THOMAS acted as a drug courier for the organization, traveling to distant cities to transport narcotics and deliver money. THOMAS explained that the heroin was processed and packaged at a "lab" in Chicago.

B. Wiretap Investigation

22. Beginning on June 14, 2002, several federally court-authorized wiretaps involving several cellular telephones used by **KELLY JONES** and **CARLOS JIRON**, were obtained. These wire taps involved Target Phones I through X. KELLY JONES was the principal user of Target Phones I, II, III, and VIII, and LUCHO (JIRON) was the principal user of Target Phones IV, V, VI, VII, IX, and X. The relevant orders were obtained on the following phones and dates: June 14, 2002 (Target Phones I and II); July 12, 2002 (Target Phones I, II and III); August 9, 2002 (Target Phones I, III, IV and V); September 6, 2002 (Target Phones I, III, VI, and VII); October 10, 2002 (Target Phones I, VI, and VIII); and October 25, 2002 (Target Phones IX and X).

IV. INTERCEPTED CONVERSATIONS AND SURVEILLANCE

23. Pursuant to the above-listed court orders, wire communications to and from **Target Phones I** through **X** were intercepted at various times from June 14, 2002 to the present. Moreover, agents conducted surveillance before and during the time periods of the wire interceptions. The intercepted conversations and related investigation establish the involvement of members of the VALENCIA organization in the drug trafficking conspiracies charged in the attached complaint.

24. For some of the calls summarized below, I have placed in brackets my and other agents' understanding of what is being said during the call, based on the contents and context of the conversations, my experience as a law enforcement officer and the experience of other law enforcement officers in this investigation, including our experience listening to the intercepted conversations as a whole. The times listed for these calls are approximate. In most cases, voice identifications are based on names used during the intercepted conversations, voice recognition that has been accomplished to date by agents or translators, historical information developed during this investigation, telephone subscriber information, and/or surveillance by agents. Many of the conversations were in Spanish and have been translated, which translations are preliminary. Finally, the summaries below do not include all potentially criminal calls intercepted during the

period of interception, or all statements or topics covered during the course of the intercepted conversations.

Drug Shipment From New York to Chicago
June 15 - 17, 2002

25. On June 15, 2002, at approximately 3:51 p.m., KELLY JONES used **Target Phone I** to contact telephone number (773) 895-4323, a cellular phone subscribed to DAVID ACEVEDO. During this call, JONES spoke on the phone with Individual N and asked for "Diana's" telephone number. Individual N provided the telephone number "547-0370."

26. On June 15, 2002, at approximately 5:16 p.m., KELLY JONES received an incoming call on **Target Phone I** from (773) 547-0370, the number previously provided by Individual N for "Diana" (later identified as DIANA MUNOZ). During this telephone conversation, KELLY JONES and MUNOZ agreed to meet in order for JONES to give MUNOZ a "ticket." MUNOZ informed JONES that she needed to "shower" and "pack."

27. On June 15, 2002, at approximately 5:18 p.m., KELLY JONES using **Target Phone II** called telephone number (646) 246-3855, a New York telephone number, and spoke to a person in New York who supplies heroin to the VALENCIA organization (the "New York Supplier"). JONES told the New York Supplier that he (JONES) was sending his girlfriend on this same date and her flight arrived at 11:00 p.m. JONES asked if he would like her to travel to New York Supplier's "crib" by taxi [take a taxi cab to New York Supplier's

home to pick up heroin]. New York Supplier instructed JONES to have her (MUNOZ) call New York Supplier when she arrives. JONES informed New York Supplier that he (JONES) will give her New York Supplier's telephone number and she will call. JONES informed New York Supplier that her name is "Diana."²⁸

28. On June 15, 2002, at approximately 8:02 p.m., KELLY JONES received a call on **Target Phone II** from MUNOZ, and MUNOZ told JONES that she was at the airport and that she missed her flight. MUNOZ advised JONES that a flight was leaving the following morning and that she would take that flight. MUNOZ stated that she would call JONES after she made the flight arrangements.

29. On June 15, 2002, at approximately 8:28 p.m., while surveillance agents observed a Hispanic female standing near the ATA Airlines ticket counter at Midway Airport. A Chicago Police Department (CPD) officer approached MUNOZ and asked for identification. MUNOZ produced identification documents showing that she was "Diana Munoz," and indicated to the officer that her address was 2456 North Kilpatrick, Chicago, Illinois.

30. On June 15, 2002, at approximately 8:29 p.m., KELLY JONES received a call on **Target Phone II** from MUNOZ. MUNOZ informed

²⁸After this telephone conversation, a Customs agent contacted ATA airlines and determined that ATA had two flights leaving Chicago Midway Airport and arriving in New York at LaGuardia Airport on June 15, 2002. The first flight was scheduled to depart Midway at 7:09 p.m. and arrive at LaGuardia at 10:29 p.m. The second flight was scheduled to depart Midway at 8:10 p.m. and arrive at LaGuardia at 11:30 p.m.

JONES that she arranged a 6:20 a.m. flight for the following morning (June 16, 2002). MUNOZ asked JONES if he would pick her up from the airport and JONES agreed.

31. On June 15, 2002, at approximately 8:56 p.m., a Customs agent observed MUNOZ standing near the curb of the ATA departure area at Midway. The agent observed a black Lincoln Navigator with at least two male occupants, with Illinois license plate 1353413, drive to the ATA arrival area.²⁹ MUNOZ entered the Navigator, and the vehicle departed the area.

32. The next day (June 16, 2002) at approximately 7:08 a.m., MUNOZ called **Target Phone I** and left a voice message. She stated in her voice message that she missed her flight and that she made reservations on the next available flight, which was departing later that same day at 7:00 p.m. MUNOZ stated that JONES should call "his friend" [New York Supplier from whom she was going to pick up the heroin] and let him know that she would contact him (New York Supplier) when she arrived.

33. On June 16, 2002, at approximately 7:00 p.m., KELLY JONES received a call on **Target Phone II** from New York Supplier. During this telephone conversation, New York Supplier informed JONES that he was waiting for JONES' girlfriend (MUNOZ) and asked what time she would arrive. JONES informed New York Supplier that she would

²⁹Based on Illinois Secretary of State ("SOS") records, this vehicle is registered to KELLY JONES. Moreover, on prior occasions, surveillance agents and officers have seen KELLY JONES driving this vehicle.

arrive at 10:00 p.m. New York Supplier instructed JONES to have her (MUNOZ) call New York Supplier when she arrived.

34. On June 16, 2002, at approximately 9:22 p.m., KELLY JONES using **Target Phone II** made an outgoing call to New York Supplier. During this call, JONES asked New York Supplier if MUNOZ should travel to New York Supplier's apartment. New York Supplier stated that he had instructed MUNOZ where to go. JONES asked New York Supplier to call him (JONES) when it [the drug transaction] was done.

35. On June 16, 2002, at approximately 9:55 p.m., KELLY JONES received a call on **Target Phone II** from MUNOZ. JONES instructed MUNOZ to travel to the Greyhound bus station at the Port Authority on 42nd Street and 5th Street [in New York].

36. On June 16, 2002, at approximately 10:04 p.m., KELLY JONES received a call on **Target Phone II** from MUNOZ. During this call, JONES asked MUNOZ if she had a bag or if "it's showing" [boom box used to conceal the heroin] and if she was going to attempt to put "it" [the boom box] in her bag.

37. On June 17, 2002, at approximately 2:59 p.m., MUNOZ called **Target Phone I** and left a voice message. MUNOZ stated that she was in Chicago and would be downtown at 3:30 p.m. MUNOZ further stated that a person [believed to be a friend of MUNOZ] would pick her up and requested JONES to call her in order to make arrangements for MUNOZ to see him [to give JONES the heroin].

38. On June 17, 2002, at approximately 4:10 p.m., surveillance agents and officers (collectively "surveillance agents") observed a Dodge Neon arrive at the Greyhound bus station in Chicago, Illinois, and further observed MUNOZ enter that vehicle.

39. On June 17, 2002, at approximately 4:48 p.m, KELLY JONES received a call on **Target Phone II** from MUNOZ. During the call, MUNOZ informed JONES that she was currently at her residence. JONES informed MUNOZ that he would arrive at her residence in thirty minutes.

40. On June 17, 2002, at approximately 5:25 p.m., surveillance agents went to MUNOZ's residence at 2456 North Kilpatrick, Chicago, Illinois. Agents/officers observed the Dodge Neon parked in front of that residence. Shortly thereafter, agents and officers observed three individuals, later determined to be KELLY JONES, WILLIAM MORCIGLIO, and DANNY MALDONADO,³⁰ enter the 2456 North Kilpatrick residence without anything visible in their possession, and afterwards observed those same three individuals along with DAVID ACEVEDO exit the residence. MALDONADO was in possession of a "boom box" style portable stereo [commonly used by members of the VALENCIA organization to transport heroin], which he

³⁰These identifications are based on Customs agents' familiarity of the physical appearance of these members of the organization and the agents' review of the surveillance video tape.

handed to KELLY JONES.³¹ Afterwards, JONES and other unidentified individuals entered JONES' Lincoln Navigator and left the area.

41. On June 17, 2002, at approximately 10:52 p.m., KELLY JONES called an unknown male (hereinafter UM 1) using **Target Phone II**. During this conversation, UM 1 complained to JONES that the "CDs" [heroin] that JONES had provided to him were "stepped-on."³² In response, JONES asked whether UM 1 was referring to the new ones that JONES had just given UM 1, and further stated that he (JONES) had not touched them [that JONES had not stepped on or cut the heroin].

KELLY JONES Delivers Drug Proceeds to COSME CHACON
June 20 - 21, 2002

42. On June 20, 2002, at approximately 12:45p.m., KELLY JONES received a call on **Target Phone II** from "MENO" (COSME CHACON). This call was from (312) 733-2470, which is registered to COSME CHACON, 1842 S. Blue Island, Chicago, Illinois. During this conversation, "MENO" asked JONES if they have to talk today, and JONES replied it would be good to talk. JONES asked "MENO" how he

³¹Both NATHAN THOMAS and SOI 1 have indicated to law enforcement agents/officers that members of the VALENCIA organization use boom box style stereos to transport drugs and drug proceeds. Also, as set forth below, DIANA MUNOZ used a boom box style portable stereo to transport approximately 1.5 kilograms of heroin from New York to Chicago on behalf of the organization.

³²Based on Affiant's training and experience, drugs that are "stepped-on" or "cut" means drugs that are mixed with a substance to increase the quantity of drugs, and as a result, generally reducing the quality of the drugs.

wanted to do it, and "MENO" told JONES to tell me when you are ready.

43. During the investigation, NATHAN THOMAS accompanied agents to the above subscriber address (1842 S. Blue Island, Chicago, Illinois), which is a wire remitter business, and stated that members of the VALENCIA organization delivered currency to this business location.

44. On June 20, 2002, at approximately 6:23 p.m., KELLY JONES received a call on **Target Phone II** from JAMES VALENCIA. During this conversation, JONES informed VALENCIA that he did not have MENO's (CHACON) phone number. JONES further stated that MENO was going to call him at 4:00 p.m., in order to set something up [to arrange a meeting likely for the purpose of delivering drug money]. JONES then stated that MENO never called him. VALENCIA then provided JONES with the telephone number 851-3051. Subsequent interceptions of MENO's telephone calls indicate that the correct telephone number is (773) 851-3021.

45. On June 21, 2002 at approximately 12:29 p.m., KELLY JONES received a call on **Target Phone II** from MENO (CHACON). During this conversation MENO asked JONES "how many", and JONES replied twenty-nine, that he had thirty but dropped one [it is believed that 29 refers to \$29,000 of drug money]. MENO asks JONES if he was going to have any more today or tomorrow. JONES replied that he might have more later. JONES then asked MENO if he knew LUCHO, and MENO

replied that he did.

46. On June 21, 2002, at approximately 6:05 p.m., KELLY JONES received a call on **Target Phone II** from MENO (CHACON) from (773) 851-3021. MENO told JONES that JONES was supposed to give him (MENO) "twenty-nine," but that the bank counted out only 27,781. JONES stated that he had counted it himself and put it [the money] in order. JONES stated that it was supposed to be thirty, but he dropped one [so that it was supposed to be \$29,000]. JONES stated that he put everything in two's and one's, and all the five's in five hundreds. JONES stated that is how he always brings it. JONES stated that it is not his money, and that he just organizes it and gives it away.

47. On June 23, 2002, at approximately 1:47 p.m., KELLY JONES received a call on **Target Phone II** from JAMES VALENCIA. During this conversation, VALENCIA instructed JONES to contact LUCHO (CARLOS JIRON). JONES then asked VALENCIA about problems with MENO (CHACON). JONES stated that "I go bring him thirty" and "I put everything in a bag and I drop." JONES told VALENCIA that he found a thousand at his house. JONES stated that he counted everything, and separated it into 20's, 10's, and 5's [denominations that represent drug money]. JONES told VALENCIA that he has never had a problem before. JONES said that MENO told him that the bank said it was twenty-seven. JONES stated that he counted the money using Individual N's machine.

Drug Shipment From New York to Chicago
June 26 - 28, 2002 and
Seizure of 1.5 Kilograms of Heroin From DIANA MUNOZ

48. On June 26, 2002, at approximately 6:43 p.m., KELLY JONES received a telephone call on **Target Phone I** from JAMES VALENCIA. During this conversation, VALENICA told JONES that he needed a "favor." VALENICA asked JONES if he (JONES) would send someone to his (VALENCIA's) "daughter's house" ["daughter's house" refers to New York, since VALENICA at one time lived and worked there, and the investigation has indicated that VALENICA has a young daughter who is believed to live in New York]. JONES stated that he would send someone to New York. VALENICA instructed JONES to see "LUCHO" (CARLOS JIRON) before the trip was made, in order to send money for his (VALENCIA's) "bills" [VALENCIA's drug debts, likely owed to an unidentified person in New York]. VALENICA told JONES that he (VALENICA) would call LUCHO and then call JONES when LUCHO is "ready." VALENICA instructed JONES to send someone on the night of the conversation (June 26, 2002).

49. On June 26, 2002, at approximately 6:48 p.m., KELLY JONES made a call on **Target Phone I** to DANIEL MALDONADO at (773) 895-1206. During this conversation, JONES spoke with MALDONADO and "ANGEL" (later identified as ANGEL MELENDEZ, JR.), and JONES informed MALDONADO that he had a "store mission," [drug-related trip to New York] that needed to be done in the "next couple of hours." JONES further stated that he had a "beach mission" [drug-

related trip to Florida] during the upcoming weekend. JONES informed MALDONADO that he was trying to "work everything up right now" and that if he (MALDONADO) could not make the trip, JONES could "send the girls" [send one of the organization's female couriers]. MALDONADO informed JONES that he would be unable to make the trip, but stated that "ANGEL" (MELENDEZ) was with him. JONES and MELENDEZ then talked on the phone. During their conversation, JONES informed MELENDEZ that there was a "mission" [drug-related trip]. MELENDEZ asked JONES if the mission was to the "beach" [Florida]. JONES stated that the "mission" was not to the "beach", but rather to the "store" [New York]. MELENDEZ informed JONES that his (MELENDEZ's) sister could drive him to New York. JONES instructed MELENDEZ to call later.

50. On June 27, 2002, at approximately 12:37 p.m., KELLY JONES used **Target Phone II** and called JAMES VALENICA. During this conversation, JONES informed VALENICA that "everything is fine." VALENICA asked JONES if he had sent his "boys" [couriers to pick up heroin] and JONES acknowledged that he did and that they left "last night". JONES further stated that he had talked with "CONSUEGRA" (VIBENCIO CONSUEGRA) and that CONSUEGRA's "big man" was ready and wanted "1000" [a quantity of heroin]. VALENICA asked JONES how many people he sent on the trip. JONES stated that he had sent two people that were traveling in a car. JONES asked VALENICA if he needed anything further. JONES informed VALENICA that the two individuals would arrive sometime around 2:00 a.m. or 3:00 a.m.,

because it was a thirteen hour drive. VALENCIA instructed JONES to have one of the individuals return via bus.

51. On June 27, 2002, at approximately 12:43 p.m., KELLY JONES received a call on **Target Phone II** from New York Supplier from (646) 263-6228. During this conversation, New York Supplier wanted to know what time JONES' "girlfriend" [MUNOZ] would be arriving. JONES informed New York Supplier that he had sent his "friends" and they would arrive sometime in the early morning hours. JONES informed New York Supplier that he was also considering sending his "girlfriend".

52. On June 27, 2002, at approximately 12:45 p.m., KELLY JONES called MUNOZ on **Target Phone II** at (773) 882-1212. During the conversation, JONES asked MUNOZ if she would travel to the "store" [New York to pick up heroin] again, and MUNOZ agreed. JONES stated that MUNOZ would need to leave on the day of the call (June 27). JONES informed MUNOZ that he would get the ticket [an airplane ticket] and she would be leaving around the same time as the last trip [her prior trip to New York on June 16, 2002].³³

³³At approximately 1:37 p.m. on June 27, 2002, JONES called telephone directory assistance using **Target Phone I**, and requested the telephone number for ISLA TRAVEL on Foster (Chicago). JONES was then forwarded to (773) 334-2118. During this call, JONES spoke with a travel representative. JONES inquired about flights to New York/LaGuardia airport, leaving on that evening, June 27, 2002. The representative told JONES that there was a flight scheduled to leave at 7:00 p.m. (Central Time) and would arrive in New York at 10:30 p.m. (Eastern Time). The representative further stated that the cost of the ticket was \$225.00. JONES told the representative that he would purchase the ticket and gave the name of the traveler as "Diana MUNOZ".

JONES asked MUNOZ if she had a bag, so that she would not have to carry "that" out [boom box stereo used to conceal the heroin]. JONES further stated that she (MUNOZ) now knows how big "they are" [boom box stereo], so she should get a duffel bag the same size. JONES stated he would get the ticket and meet her later.

53. On June 27, 2002, at approximately 12:48 p.m., KELLY JONES called VIBENCIO CONSUEGRA using **Target Phone II** at (773) 562-0537 and informed him (CONSUEGRA) that he has "two people for tomorrow night" [two individuals returning with the heroin].

54. On June 27, 2002, at approximately 2:28 p.m., KELLY JONES called MARCUS JONES using **Target Phone I** at (773) 592-0398. During this conversation, KELLY JONES informed MARCUS JONES that he (KELLY JONES) was picking up a plane ticket and he would be over later. MARCUS JONES informed KELLY JONES that he (MARCUS JONES) had his clothes ready "just in case."

55. On June 27, 2002, at approximately 2:59 p.m., KELLY JONES using **Target Phone II** called (646) 263-6228 and again spoke with New York Supplier. During this conversation, JONES informed New York Supplier that he (New York Supplier) would see JONES' girlfriend later that night (June 27). JONES informed New York Supplier that she would be there at 10:30 p.m. JONES asked New York Supplier if he wanted to "do the same thing like last time." JONES further stated that she (MUNOZ) would be flying in and she

would have a bag "to put it in" [put the boom box stereo in]. New York Supplier asked JONES if she (MUNOZ) would need any new "CD's" [heroin]. JONES stated she would. KELLY JONES further stated that the money would be coming out with his "friend" and that MUNOZ was only going to pick up and return. JONES instructed New York Supplier not to send it with "cologne" [to mask the scent of the heroin with cologne], because "a couple of people did not like it." At the conclusion of the conversation, JONES and New York Supplier agreed to place coffee with the "CD" [to mask the scent of the heroin].

56. On June 27, 2002, at approximately 8:09 p.m., KELLY JONES received a call on **Target Phone II** from New York Supplier. During the conversation, New York Supplier asked JONES if he wanted "1500". New York Supplier informed JONES that the "car" [boom box stereo] with the "1.5 engine" [1.5 kilograms of heroin] would be ready the following morning and that the other "car" [another boom box stereo with heroin] would be ready the following night, around 8:00 p.m. or 9:00 p.m.

57. On June 27, 2002, JONES spoke with MUNOZ and advised her that she may have visitors later. MUNOZ told JONES that "he" [New York Supplier] was not going to call her until tomorrow. JONES then stated that MUNOZ already knows the visitors, "your neighbors" [ACEVEDO and MELENDEZ]. JONES told MUNOZ that they should be there in about two hours. MUNOZ then told JONES to give them her cellular phone number, so she could give them her hotel

information.

58. On June 28, 2002, at approximately 11:18 a.m., KELLY JONES using **Target Phone II** called MUNOZ at (773) 710-5616. During this conversation, MUNOZ informed JONES that she was waiting to "meet this guy" and then return to Chicago. MUNOZ informed JONES that she would call him (JONES) after meeting with the person and what bus she would be traveling on.

59. On June 28, 2002, surveillance agents in New York conducting surveillance observed MUNOZ meeting with a male in New York (New York Courier). During this meeting, New York Courier was seen in possession of a boom box style portable stereo, and MUNOZ was seen in possession of a dark-colored duffle bag. New York Courier was observed putting the boom box stereo inside the duffle bag, which was then taken by MUNOZ.

60. On June 28, 2002, at approximately 3:10 p.m., KELLY JONES received a call on **Target Phone II** from MUNOZ at (773) 710-5616. During the conversation, MUNOZ asked JONES if he had talked with "DAVE" [ACEVEDO, who Affiant believes based on intercepted conversations was in New York to pick up heroin for the organization], because ACEVEDO called MUNOZ and informed her they were currently in Queens (New York). MUNOZ further stated that she was scheduled to arrive at 6:30 a.m. and that "everything is fine". MUNOZ further stated that she received money from New York Supplier in New York.

61. On June 28, 2002, at approximately 10:48 p.m., KELLY JONES using **Target Phone I** called DANNY MALDONADO at (773) 895-1206. During the conversation, JONES asked MALDONADO what "DAVE'S" last name was, and MALDONADO stated "ACEVEDO". JONES then asked what "ANGEL'S" last name was, and MALDONADO stated "MELENDEZ".

62. On June 29, 2002, at approximately 12:20 a.m., a Greyhound bus traveling from New York to Chicago stopped in Cleveland, Ohio's Greyhound bus terminal. MUNOZ was a passenger on this bus. Agents requested and received consent from the bus driver to board the bus. Agents identified themselves as police officers and told the passengers that they were conducting a routine luggage check. MUNOZ was observed standing in front of the last seat of the bus, and after the announcement was made, she was heard saying "Oh shit." Later, drug canines boarded the bus, and alerted to the duffle bag that MUNOZ claimed belonged to her. MUNOZ granted the agents consent to search the bag. Agents found the boom box stereo, and could see hidden inside the stereo clear plastic bags containing tan pellets. The bags were later removed from the stereo, and a field test of one of the pellets tested positive for the presence of heroin. The total gross weight of the heroin was approximately 1.5 kilograms. MUNOZ was not arrested at that time, nor was she questioned about the contents of the stereo.

63. On June 29, 2002, at approximately 5:55 a.m., KELLY JONES received a call on **Target Phone II** from MUNOZ at (773) 547-0370.

During this conversation, MUNOZ informed JONES that she would be at the bus station at 7:00 a.m. MUNOZ further stated that she had "bad news" and that the police "took my luggage". JONES and MUNOZ agreed to talk when she arrived in Chicago.

64. On June 29, 2002, at approximately 5:56 a.m., KELLY JONES using **Target Phone II** called DAVID ACEVEDO at (773) 610-2209. During this conversation, JONES asked ACEVEDO if everything was "o.k." ACEVEDO stated everything was "fine" and wanted to know why JONES was asking. JONES stated that he had "problems". JONES instructed ACEVEDO not to go to his "crib" [home].

65. On June 29, 2002, at approximately 6:16 a.m., KELLY JONES using **Target Phone II** called New York Supplier at (646) 263-6228. During this conversation, JONES asked if everything was all right when his "girlfriend" was there. New York Supplier stated that "everything was fine". JONES informed New York Supplier that "they took her stuff" [the police took the heroin from MUNOZ]. New York Supplier explained that everything "was perfect, like the last time" [the prior narcotics trip MUNOZ took to New York]. New York Supplier further stated that he put coffee "there" like JONES had instructed.³⁴ JONES stated that he thought MUNOZ may have lied to him and New York Supplier stated that "something is fishy" and that if a person goes to the "hospital, they take the phone away"

³⁴After the agents seized the boom box from MUNOZ at the Cleveland bus station, they found, in addition to the heroin, bags with coffee grinds inside the stereo.

[referring to getting arrested by law enforcement]. JONES stated, "yeah, I'm not stupid, I've been doing this for a few years".

66. On June 29, 2002, at approximately 6:29 a.m., KELLY JONES using **Target Phone I** called DANNY MALDONADO at (773) 895-1206. During this conversation, JONES told MALDONADO that he had "problems". JONES further stated that "they took her bag" [officers took the heroin from MUNOZ]. JONES stated that he told MELENDEZ and ACEVEDO not to go to the house "dirty". JONES further stated that "all it takes is two people to get him". JONES further stated that he (MALDONADO) should be careful with what he says, because they could get everyone on a "conspiracy." On that date, surveillance agents and officers observed DAVID ACEVEDO and ANGEL MELENDEZ arrive at KELLY JONES' residence and enter the residence carrying a boom box stereo.

67. On June 29, 2002, at approximately 12:46 p.m., KELLY JONES using **Target Phone II** called JAMES VALENCIA at a number in Columbia. During this conversation, VALENCIA asked JONES "what happened," and JONES stated that he "don't know." JONES further stated that while MUNOZ was on the bus, police officers utilized a dog on her luggage and then seized her luggage. VALENCIA instructed JONES to get a new phone and to give him (VALENCIA) the new phone number.³⁵

68. On July 5, 2002, at approximately 2:44 p.m., KELLY JONES

³⁵According to telephone records, on June 29, 2002, service was activated on **Target Phone III**.

using **Target Phone I** called Individual A. During that call, JONES told Individual A that he had to make up half of the money [that was lost due the police seizing the heroin from MUNOZ]. JONES also discussed his suspicions about MUNOZ's story about how the drugs were seized. During this call, JONES said that "my guy" [VALENCIA] would be coming in [to the United States] at the beginning of next month.³⁶

69. On July 5, 2002, at approximately 1:49 p.m., KELLY JONES using **Target Phone II** called VIBENCIO CONSUEGRA. During that call, JONES told CONSUEGRA about MUNOZ and her trip to New York, and his suspicions about MUNOZ's story.

Drug Shipment July 6 - 8, 2002

70. On July 6, 2002, at approximately 12:18 p.m., KELLY JONES using **Target Phone I** contacted DANIEL MALDONADO. During this call, JONES and MALDONADO discuss making a trip to New York [to pick up heroin]. MALDONADO indicated that he would go with DAVID ACEVEDO and that they would use KELLY JONES' white car to drive to the location. On that same date, surveillance agents observed MALDONADO and DAVID ACEVEDO standing in front of KELLY JONES' residence, along with KELLY JONES and MARCUS JONES. Later,

³⁶On June 25, 2002, at approximately 3:43 p.m., KELLY JONES received a call on **Target Phone II** from JAMES VALENCIA, in which VALENCIA provided JONES with his most recent phone number (011-573-539-7420), and indicated that he (VALENCIA) would be coming back to America in the near future to see two members of the organization who Affiant believes reside in the Detroit, Michigan area.

MALDONADO and ACEVEDO were seen getting into KELLY JONES' white Nissan Altima and driving away.

71. On July 8, 2002, surveillance agents and officers observed MALDONADO and DAVID ACEVEDO arrive at the residence of KELLY JONES and enter that residence carrying a boom box style stereo.

72. On July 8, 2002, at approximately 12:42 p.m., KELLY JONES used **Target Phone II** to contact JAMES VALENCIA and informed VALENCIA that JONES had provided "9" [a quantity of heroin] to CONSUEGRA and that JONES would give the rest to LUCHO (JIRON). JONES also informed VALENCIA that he (JONES) had made a \$5,000 deposit in the bank.

73. On July 10, 2002, at 11:50 a.m., WILLIAM MORCIGLIO called KELLY JONES on **Target Phone I**. During this conversation, JONES asked MORCIGLIO if he had picked up two stacks [\$2,000] from LUCHO and MORCIGLIO said he did. JONES told MORCIGLIO that VALENCIA has LUCHO doing everything that he (JONES) used to do and that now he (JONES) was only making "3 a month" [\$3,000 a month]. JONES told MORCIGLIO that VALENCIA has LUCHO doing everything that VALENCIA had told JONES he was not allowed to do. JONES told MORCIGLIO that LUCHO is sitting on two of them that they had to get rid of and that he (LUCHO) was working and complained that he (JONES) had nothing to do.

Drug Shipment From New York to Chicago
July 14 - 17, 2002

74. On July 14, 2002, at approximately 3:38 a.m., KELLY JONES using **Target Phone I** made a call to DAVID ACEVEDO at (773) 206-0694. During this conversation, JONES asked ACEVEDO what he was doing the following day. ACEVEDO responded that he had a family party to attend. JONES then asked ACEVEDO "what about that mish [mission or courier trip to pick up heroin]". ACEVEDO stated that he was "down with whatever", and asked JONES if he was going to get the oil changed on the car [vehicle used by the couriers to transport heroin]. During this conversation, JONES further stated that he (JONES) would receive money in order to give to ACEVEDO, so that he (ACEVEDO) would be able to leave on Monday, July 15, 2002.

75. On July 14, 2002, at approximately 1:32 p.m., KELLY JONES received a call on **Target Phone I** from DANIEL MALDONADO at (773) 895-1206. During this conversation, JONES told MALDONADO that there might be another "mission" [courier trip to pick up heroin]. MALDONADO asked JONES if he (JONES) knew "how much". JONES further stated that he needed to get the oil changed on the "white car" [JONES' white Nissan Altima used by couriers to pick up heroin].

76. On July 14, 2002, at approximately 3:03 p.m., KELLY JONES using **Target Phone III** called LUCHO on **Target Phone IV**. JONES asked LUCHO if he had any "platita" [money].³⁷ LUCHO informed JONES

³⁷Affiant believes that JONES was attempting to collect money from LUCHO to take to New York on a heroin-related trip.

that nothing had arrived. LUCHO added that CONSUEGRA was supposed to give him (LUCHO) some "platita" [money] but he (CONSUEGRA) left for "Las Torres" [New York] without giving him anything. LUCHO also advised that LA NEGRA (SANDRA P. VELAZQUEZ) could not be located anywhere. JONES asked LUCHO if he (LUCHO) had any "work" [drug-related activity]. LUCHO responded that he had people working [engaged in drug-related activity]. JONES responded "me too". JONES told LUCHO to give him 1,500 [money] when he (LUCHO) had it and that it was for his (JONES') friends. LUCHO stated that upon arrival of the "platita" [money] he would contact JONES.

77. On July 14, 2002, at approximately 8:23 p.m., KELLY JONES received a call on **Target Phone III** from JAMES VALENCIA. During this conversation, VALENCIA advised JONES to "send the guys over" [send the couriers to pick up heroin].

78. On July 15, 2002, at approximately 1:14 p.m., KELLY JONES received a call on **Target Phone III** from an individual believed to be New York Supplier at (347) 724-6296. During this conversation, New York Supplier asked if the "kids" [drug couriers] were coming over [driving to New York]. JONES responded by telling New York Supplier "yeah, I was trying to get some receipts [money] together for you first [to give to New York Supplier]". New York Supplier then asked JONES when "they" [drug couriers] were going to arrive. JONES stated that "they" [drug couriers] were going to leave that afternoon and get "there" [to New York] in the morning. JONES then

stated that he would call New York Supplier before "they" [drug couriers] left.

79. On July 15, 2002, at approximately 1:42 p.m., JONES made a call on **Target Phone I** to DANIEL MALDONADO at (773) 895-1206. JONES advised MALDONADO that he (JONES) needed to know who was going on the trip [trip to New York to pick up heroin]. MALDONADO stated that DAVE (ACEVEDO) and ANGEL (MELENDEZ, JR.) were going. MALDONADO further stated that ACEVEDO and MELENDEZ went to get the oil changed, and that they were ready to leave. JONES told MALDONADO that he (JONES) was going to LUCHO's "crib" [residence] to see if he (LUCHO) had any money, because they would need money to "drive over there" [to New York]. MALDONADO then asked JONES if he wanted "them" [drug couriers] to leave before or after rush hour. JONES advised that he wanted them to leave before.

80. On July 15, 2002, at approximately 1:50 p.m., KELLY JONES received a call on **Target Phone I** from MARCUS JONES at (773) 592-0398. During this call, KELLY JONES asked MARCUS JONES if he had the oil changed. KELLY JONES further stated that "these niggers got to ride", and instructed MARCUS JONES to change the oil before "they" [drug couriers] go.

81. On July 15, 2002, at approximately 3:10 p.m., KELLY JONES made a call on **Target Phone III** to JAMES VALENCIA at 011-573-539-7420. During this conversation, VALENCIA asked JONES if he (JONES) had sent the "guys" [drug couriers]. JONES stated that he did not

have any money [for the couriers to take to New York]. VALENCIA told JONES to call LUCHO; "maybe he has something." JONES asked VALENCIA if LUCHO had the same number or a new number. VALENCIA provided the number "931-2177" (**Target Phone V**) for LUCHO.

82. On July 15, 2002, at approximately 3:23 p.m., VALENCIA called KELLY JONES on **Target Phone III**. VALENCIA stated that he called LUCHO and that he (LUCHO) had something for JONES. JONES asked "what number?", to which VALENCIA responded "818-2812" (**Target Phone IV**). Affiant believes VALENCIA was telling JONES that LUCHO had drug money for JONES, which was to be transported to New York by the couriers.

83. On July 15, 2002, at approximately 3:25 p.m., LUCHO using **Target Phone IV** called KELLY JONES on **Target Phone III**. LUCHO stated that he talked to "Jotita" [VALENCIA] and that JONES should come and pick up ten "pesitos" [drug money] to give to the "son". JONES asked if LUCHO had twelve [an amount of money] and LUCHO responded that he had twelve [an amount of money] but that he's going to take two [an amount of money] because he's broke. JONES stated that he would stop by LUCHO's apartment at 3:30 p.m.

84. On July 15, 2002, at approximately 3:47 p.m., KELLY JONES made a call on **Target Phone I** to DANIEL MALDONADO at (773) 895-1206. During this conversation, JONES asked MALDONADO what time "they" [drug couriers] were leaving. MALDONADO asked JONES if he (JONES) had the "loot" [money]. JONES advised MALDONADO to come to

his house and "grab everything". MALDONADO advised that "they" [drug couriers] could leave at 7:00 p.m.

85. On July 15, 2002, at approximately 4:20 p.m., LUCHO using **Target Phone IV** called KELLY JONES on **Target Phone III**. LUCHO stated that he passed [gave] him (JONES) eleven "pesitos", eleven thousand [amount of money]. JONES confirmed this.³⁸

86. On July 15, 2002, at approximately 6:15 p.m., surveillance agents observed KELLY JONES, MARCUS JONES, DAVID ACEVEDO, ANGEL MELENDEZ, JR. and DANIEL MALDONADO arrive at and enter the residence of KELLY JONES, at 1433 W. Warner, Chicago, Illinois. At approximately 6:55 p.m., agents/officers observed MELENDEZ and MARCUS JONES exit 1433 W. Warner and walk to the white Nissan Altima registered to KELLY JONES. MALDONADO then exited 1433 W. Warner and entered the Altima, while carrying a radio. ACEVEDO then exited the residence and entered the Altima. The Altima departed that area.

87. On July 15, 2002, at approximately 7:15 p.m., KELLY JONES using **Target Phone III** called "LUCHO" on **Target Phone IV**. JONES asked LUCHO if he (LUCHO) spoke with LA NEGRA (SANDRA P. VELAZQUEZ). LUCHO responded that he just did. JONES asked LUCHO how much he (LUCHO) "passed" [distributed] to her (LA NEGRA) and whether she wanted more. LUCHO stated that he was going to "pass"

³⁸on July 18, 2002, KELLY JONES called JAMES VALENCIA and told VALENCIA that he (JONES) had given LUCHO three hundred [quantity of heroin] and that LUCHO had given JONES "eleven" [amount of money] the other day [to bring to New York].

[distribute] to LA NEGRA "8" [quantity of heroin] and see if she needed more. LUCHO stated that he would call JONES or give LA NEGRA JONES' number so that she could call him. During this intercepted conversation, LUCHO could be heard in the background talking over the telephone with a person believed to be LA NEGRA.

88. On July 16, 2002, at approximately 4:06 a.m., KELLY JONES made a call on **Target Phone I** to ACEVEDO at (773) 610-2209. During this conversation, ACEVEDO advised JONES that they were in Pennsylvania. ACEVEDO stated that they should arrive in New York at 8:00 a.m. or 9:00 a.m., Chicago time.

89. On July 16, 2002, at approximately 11:51 a.m., KELLY JONES received a call on **Target Phone III** from New York Supplier at (347) 724-6296. During this conversation, New York Supplier advised JONES that everything was okay, but his (New York Supplier's) "guy" [drug courier assisting New York Supplier] worked overnight, and did not finish until 6:00 a.m., so New York Supplier thought that he was sleeping. New York Supplier further stated that he was going to send JONES a "check" for fifteen hundred dollars.

90. On July 16, 2002, at approximately 11:53 a.m., KELLY JONES received a call on **Target Phone I** from ACEVEDO at (773) 610-2209. During this conversation, ACEVEDO advised JONES that the "guy" [drug courier assisting New York Supplier] needed more time, that he was sleeping, and that they were going to give him another

hour.

91. On July 16, 2002, at approximately 12:00 p.m., based on intercepted conversations between KELLY JONES and the drug couriers, Customs in Chicago related in substance to agents in New York that the heroin transfer would take place in the vicinity of 35th Street and Steinway in New York, and that the couriers were currently at a Kentucky Fried Chicken (KFC) at an undisclosed location. Based on this information, agents and officers checked the KFC located at Northern Blvd. and 88th Street, the closest KFC to the 30-33 93rd Street location, and discovered JONES' 1995 Nissan Altima with Illinois license number 3104374 parked in front.

92. On July 16, 2002, at approximately 1:15 p.m., ACEVEDO and MELENDEZ drove to the vicinity of 88th Street between Northern Blvd. and 32nd Ave. At approximately 1:30 p.m., agents observed ACEVEDO and MELENDEZ park their vehicle just before the KFC parking lot, exit the vehicle, and meet with an Hispanic male, believed to be New York Courier.³⁹ ACEVEDO, MELENDEZ and New York Courier entered the Nissan Altima and proceeded on 88th Street across Northern Blvd. At approximately 1:35 p.m., the vehicle stopped on 88th Street between Northern Blvd. and 34th Avenue. At approximately 1:41 p.m., New York Courier exited the Nissan with a

³⁹This individual (New York Courier) appeared to be the same person who on June 28, 2002 delivered a "boombox" style radio (which contained approximately 1.5 kilograms of heroin) to DIANA MUNOZ.

knapsack over his shoulder and entered the front entrance of an apartment building located at 88-11 34th Avenue. The Nissan Altima with ACEVEDO and MELENDEZ then left the area. Affiant believes that ACEVEDO and MELENDEZ met New York Courier, a courier for New York Supplier, for the purpose transferring drug money to New York Courier which was contained in the knapsack.

93. On July 16, 2002, at approximately 1:48 p.m., DAVID ACEVEDO called KELLY JONES on **Target Phone I** from (773) 206-0694. ACEVEDO advised JONES that they were "riding out now" [leaving New York]. ACEVEDO further stated that they would arrive in Chicago, Illinois between 2:00 a.m. and 3:00 a.m.

94. On July 16, 2002 at approximately 5:34 p.m., KELLY JONES received a call on **Target Phone I** from DAVID ACEVEDO at (773) 206-0694. During this conversation, ACEVEDO advised JONES that they were returning from New York and that they were currently in Pennsylvania. JONES asked ACEVEDO if "Angel" (MELENDEZ) was driving, to which ACEVEDO advised that he (MELENDEZ) was driving.

95. On July 16, 2002, at approximately 7:43 p.m., KELLY JONES made a call on **Target Phone III** to JAMES VALENCIA at 011-573-539-7420. During this conversation, VALENCIA asked JONES about his "friends" [drug couriers]. JONES advised VALENCIA that they would return between 3:00 a.m. and 4:00 a.m.

96. On July 16, 2002, at approximately 10:03 p.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ, JR. at (773)

206-0694. During this conversation, MELENDEZ first spoke with MARCUS JONES, who answered the phone. MARCUS JONES asked MELENDEZ if they were almost home. MELENDEZ advised that they were about four hours away from Chicago. KELLY JONES then came to the phone and MELENDEZ advised KELLY JONES that they were four or five hours away from Chicago. MELENDEZ then stated that he would call KELLY JONES in two hours. KELLY JONES asked MELENDEZ what their "ETA" [estimated time of arrival] was, to which MELENDEZ replied about "three" [hours].

97. On July 17, 2002, at approximately 2:03 a.m., KELLY JONES received a call on **Target Phone I** from DAVID ACEVEDO at (773) 206-0694. During this conversation, ACEVEDO advised JONES that they would be at JONES' "crib" [home] at about 3:30 a.m.

98. On July 17, 2002, at approximately 3:32 a.m., agents observed the white Nissan Altima, registered to KELLY JONES, travel west on Warner street from Southport Avenue in Chicago, Illinois. The vehicle circled the area and parked in front of a fire hydrant in front of 1433 W. Warner., the residence of KELLY JONES. Agents observed DAVID ACEVEDO walk to the residence carrying a bag over his shoulder and observed ANGEL MELENDEZ, JR. follow ACEVEDO into the residence. At approximately 3:40 a.m, agents/officers observed MARCUS JONES exit the residence and walk to the north side of Warner. MARCUS JONES carried a bag back into the residence. At approximately 3:58 a.m., agents/officers observed MARCUS JONES, DAVID ACEVEDO, and ANGEL MELENDEZ, JR. exit the residence, enter

the white Nissan Altima, and leave the area. Affiant believes that MELENDEZ and ACEVEDO returned from their trip to New York with heroin stored in the bag and brought the heroin to KELLY JONES at JONES' residence.

99. On July 17, 2002, at approximately 9:47 a.m., KELLY JONES received a call on **Target Phone III** from New York Supplier at (347) 724-6296. During this call, New York Supplier asked JONES why he (JONES) had not called him (New York Supplier) when the couriers returned. JONES stated that he (JONES) did not know that New York Supplier wanted a phone call at 4:00 a.m. New York Supplier told JONES to call him anytime. During this same conversation, New York Supplier asked JONES if everything was fine with the "check". JONES stated, "yeah, well let me check, yeah its okay". New York Supplier asked JONES if "these guys" were going to "send someone this week, or not yet". JONES advised New York Supplier that he did not know, but he would find out and call New York Supplier back. New York Supplier stated "alright, give me a call and I'll be ready".

100. On July 17, 2002, at approximately 10:10 p.m., LUCHO using **Target Phone V** called KELLY JONES on **Target Phone III**. LUCHO asked JONES if he (JONES) could give him 300 "pesitos" [quantity of heroin] and JONES stated "yeah" and that he would be by the apartment [LUCHO's residence] at 10:00 a.m.

101. On July 18, 2002, at approximately 11:01 a.m., LUCHO using **Target Phone V** called KELLY JONES on **Target Phone III**. JONES asked LUCHO where he (LUCHO) was at, and LUCHO replied at the "apartment" [LUCHO's residence]. LUCHO and JONES agreed to meet at LUCHO's residence at 11:30 a.m.

102. On July 18, 2002, at approximately 12:01 p.m., KELLY JONES using **Target Phone III** called JAMES VALENCIA at telephone number 011-573-539-7420. JONES told VALENCIA that he had given LUCHO three hundred [quantity of heroin]. JONES also advised VALENCIA that LUCHO had given JONES "eleven" [an amount of money] the other day. It is believed LUCHO was next to JONES at the time of this conversation because LUCHO's voice is heard in the background telling JONES CONSUEGRA's phone number when JONES is repeating it to VALENCIA. Moreover, on July 18, 2002, surveillance observed JONES enter what is believed to be LUCHO's apartment (located at 3005 Gunnison, Chicago, IL) at approximately 12:00 p.m. and did not see JONES exit the residence until approximately 1:09 p.m. that same day.

103. On July 18, 2002, at approximately 2:14 p.m., KELLY JONES using **Target Phone III** called LUCHO on **Target Phone V**. LUCHO asked JONES where to meet and JONES stated that he (JONES) would park his car at Irving Park and Damen, past a Firestone.

104. On July 18, 2002, at approximately 2:30 p.m., KELLY JONES using **Target Phone III** called LUCHO on **Target Phone V**. LUCHO told JONES that he (LUCHO) was on Lawrence and Elston and would meet JONES in eight minutes.

105. On July 18, 2002, at approximately 2:42 p.m., LUCHO using **Target Phone IV** called KELLY JONES on **Target Phone III**. JONES asked LUCHO where he was at and LUCHO replied that he was at Irving Park and Damen. LUCHO stated that he did not see his (JONES') truck, and JONES replied he was on Irving Park.

106. On July 18, 2002, at approximately 2:45 p.m., surveillance agents observed KELLY JONES and an individual (believed to be LUCHO) meet in front of a Firestone tire and auto repair store located at 1910 West Irving Park Road, Chicago, Illinois. At approximately 2:50 p.m., a CPD officer conducted a traffic stop on the vehicle driven by the individual (LUCHO) who had earlier met with JONES at the Firestone. LUCHO was driving a tan, Chrysler Sebring, bearing Illinois license plate number 2512007. The officer received verbal consent from LUCHO to search the vehicle, and in doing so, the officer observed two stacks of United States currency inside the glove compartment. The cash was not disturbed nor was any contraband discovered in the vehicle. LUCHO provided the officer with a Florida driver's license identifying him as "CARLOS JIRON" with a date of birth of November

2, 1967.⁴⁰ JIRON provided other documents indicating his residence was located at 3005 Gunnison, Apartment 1E, Chicago, Illinois, 60625.⁴¹

107. On July 18, 2002, at approximately 4:53 p.m., LUCHO using **Target Phone IV** called KELLY JONES on **Target Phone III**. LUCHO told JONES that he (LUCHO) spoke to "Consu" (CONSUEGRA) and that CONSUEGRA wanted to know if JONES could give him (CONSUEGRA) the remainder of what [heroin] JONES had there, "the small check for five hundred [quantity of heroin]". LUCHO told JONES that CONSUEGRA wanted to speak to him (JONES) about it.

Drug Shipment From New York to Chicago
July 19 - 21, 2002

108. On July 18, 2002, at approximately 10:34 p.m., KELLY JONES received a call on **Target Phone I** from ANGEL MELENDEZ, JR., during which MELENDEZ told JONES that a trooper had conducted a car stop on a vehicle occupied by MELENDEZ and DAVID ACEVEDO and seized the money that they MELENDEZ and ACEVEDO were transporting to New York. Later, MELENDEZ spoke with KELLY JONES on **Target Phone I**, and it appeared that they allegedly were stopped in either Ohio or

⁴⁰Records from the Florida Department of Highway Safety and Motor Vehicles confirms this information.

⁴¹On July 22, 2002, a surveillance officer observed the same Chrysler Sebring, bearing Illinois license plate 2512007, parked on Sacramento Avenue just south of Gunnison Street.

Indiana.⁴² As a result of this incident, KELLY JONES decided to complete the trip to New YORK himself with ACEVEDO.

109. On July 19, 2002, at approximately 11:22 a.m., KELLY JONES received a telephone call on **Target Phone III** from New York Supplier at (347) 742-6296. During the conversation, JONES and New York Supplier discussed the loss or seizure of money by law enforcement from David ACEVEDO and Angel MELENDEZ. During this conversation, JONES informed New York Supplier that he (JONES) would travel to New York and would depart on July 19, 2002. New York Supplier informed JONES that he (New York Supplier) wanted to talk with JONES.

110. On July 19, 2002, at approximately 11:24 a.m., KELLY JONES using **Target Phone III** called James VALENCIA at 011-573-539-7420. During this conversation, JONES informed VALENCIA that his friends were traveling and were stopped by law enforcement. VALENCIA asked JONES if there was anyone else to "send it back [travel to New York]?" JONES informed VALENCIA that he (JONES) would travel to New York.

111. On July 19, 2002, at approximately 11:28 a.m., KELLY JONES using **Target Phone I** called Individual B at (773) 935-2902. During the conversation, JONES informed Individual B that "I got fucking problems I need to take care of". JONES then informed

⁴²The investigation thus far has shown that there is no record of the claimed traffic stop or seizure by the Ohio State Police or Indiana State Police.

Individual B that he was going to travel to New York and leave within an hour. During this same conversation, Individual B asked JONES why he was going to travel to New York. JONES stated, "cause I got problems and it seems that nobody can handle shit right. I have to do shit myself". JONES informed Individual B that DAVID ACEVEDO and ANGEL MELENDEZ were stopped by law enforcement and that "shit gets confiscated" [referring to money] and they returned to Chicago with no "paperwork" to show that money was seized by law enforcement.

112. On July 19, 2002, at approximately 11:41 a.m., KELLY JONES received a call on **Target Phone III** from LUCHO. During this conversation, LUCHO told JONES that he has "some receipts here so you can take over there" [referring to picking up money for JONES to take with him to New York].

113. On July 19, 2002, at approximately 12:00 p.m., agents established surveillance in the area of 1433 W. Warner, Chicago, Illinois, the residence of KELLY JONES, in an attempt to locate JONES. At approximately 12:55 p.m., agents/officers observed KELLY JONES driving his Lincoln Navigator east on Warner and park near his residence. Agents/officers observed KELLY JONES and a Hispanic male, believed to be DAVID ACEVEDO, enter 1433 W. Warner. Agents/officers observed KELLY JONES walk into the residence carrying a manilla envelope.

114. On July 19, 2002, at approximately 1:30 p.m., KELLY JONES

using **Target Phone III** called JAMES VALENCIA at 011-573-539-7420. During this conversation, JONES informed VALENCIA, "I got that [drug money] from LUCHO" and that he (JONES) would be leaving immediately [for New York]. JONES and VALENCIA further discussed how much drug money JONES would transport to New York. JONES asked VALENCIA "How much for over there, 21?" [\$21,000 that JONES was taking to New York]. VALENCIA replied, "yea, 21, thank you so much."

115. On July 19, 2002, at approximately 1:52 p.m., agents/officers observed KELLY JONES and an individual believed to be DAVID ACEVEDO at the Navigator with the trunk of the vehicle open. At approximately 1:58 p.m., agents/officers observed the individual believed to be DAVID ACEVEDO exit the vehicle and enter a currency exchange business, located at 4000 N. Broadway, Chicago, Illinois. The individual believed to be ACEVEDO was observed exiting the currency exchange, returning to the Lincoln Navigator, and then returning to the currency exchange. At approximately 2:04 p.m., agents/officers observed the individual believed to be ACEVEDO exit the currency exchange, re-enter the Lincoln Navigator, and leave the area.

116. On July 19, 2002, at approximately 2:01 p.m., KELLY JONES using **Target Phone III** called New York Supplier at (347) 724-6296. During this conversation, JONES informed New York Supplier that he (JONES) would be arriving in New York at approximately 3:00

a.m. (on July 20, 2002), and that he was currently leaving Chicago.

117. On July 19, 2002, at approximately 7:19 p.m., KELLY JONES received a call on **Target Phone I** from WILLIAM MORCIGLIO at (626) 221-4725. During this conversation, JONES informed MORCIGLIO that, "I'm fucking going to the store [New York] to handle something". JONES further stated, "sometimes you got to do shit yourself". JONES also stated, "and then I'll be in D-town [Detroit] on Sunday".

118. On July 20, 2002, at approximately 4:00 a.m. (EST), KELLY JONES's black Lincoln Navigator with license number 1353413, was observed traveling west on Northern Blvd. in the area of 78th Street in New York. At approximately 4:15 a.m., the Navigator proceeded to Manhattan and was lost in the vicinity of 42nd Street and 6th Avenue. At approximately 5:00 a.m. (EST), surveillance units returned to the vicinity of Northern Blvd. between 94th Street and 69th Street. At approximately 1:00 p.m. (EST), agents located the Navigator traveling eastbound on Northern Blvd. in the vicinity of 88th Street. The Navigator turned onto 90th Street and parked between Northern and 34th Avenue, closer to Northern Blvd. During a drive-by of the Navigator, another male later identified as New York Supplier was observed in the rear seat of the Navigator.

119. Shortly thereafter, the Navigator circled the block and returned to 90th Street and parked on the eastside of the

street. At approximately 1:10 p.m. (eastern time), New York Supplier exited the rear passenger door of the Navigator with a "boombox" style radio in hand and proceeded midway down the block. A drive-by revealed that New York Supplier was sitting in a dark colored Infinity with New York license number BKJ5755, parked mid-block on the eastside of the street. At approximately 1:24 p.m. (eastern time), New York Supplier emerged onto the street empty handed. JONES and New York Supplier appeared to be engaged in conversation while sitting on steps located in front of a building, mid-block on 90th Street between Northern and 34th Ave. At approximately 1:38 p.m. (eastern time), New York Supplier departed from JONES and was later seen sitting in the Infinity. At approximately 1:40 p.m. (eastern time), a Hispanic male believed to be New York Courier carrying a "boombox" style radio emerged from the front entrance of an apartment building located at 88-11 34th Avenue. New York Courier was using a cellular telephone, walked up 90th Street and delivered the "boombox" to JONES. Affiant believes that KELLY JONES provided New York Supplier with a boom box containing drug proceeds, and received from New York Courier a boom box containing heroin.

120. On July 20, 2002, at approximately 1:56 p.m., KELLY JONES received a call on **Target Phone I** from Individual B at (773) 255-4307. During this conversation, JONES informed Individual B that he was currently in Manhattan.

121. On July 21, 2002, at approximately 10:32 a.m., KELLY JONES talked with New York Supplier on **Target Phone III**. During this conversation, New York Supplier asked JONES if he was "okay". JONES stated that everything was "okay".

122. On July 21, 2002, at 11:51 a.m., KELLY JONES received a call on **Target Phone III** from JAMES VALENCIA. During this conversation, VALENCIA asked JONES, "How's everything?" and "You home?" JONES informed VALENCIA that he was at home and "everything went fine, man". Affiant believes that VALENCIA was inquiring whether JONES was able to complete the drug transaction without incident.

Delivery of Drug Proceeds
July 22 - 23, 2002

123. On July 22, 2002, at approximately 4:47 p.m., LUCHO (CARLOS JIRON) using **Target Phone V** called KELLY JONES on **Target Phone III**. JONES received the telephone call and gave the phone to WILLIAM MORCIGLIO. LUCHO told MORCIGLIO that he (LUCHO) spoke with JAMES VALENCIA to see if JONES could give him (LUCHO) 15 "Pesitos" (an amount of money) and to tell JONES to "hold the rest for the girl".⁴³

⁴³On July 22, 2002, at approximately 5:03 p.m., VALENCIA called KELLY JONES on **Target Phone III**. VALENCIA asked JONES if LUCHO had called him and JONES replied that he had. VALENCIA then told JONES "15 [amount of money] for LUCHO" and JONES replied "Okay, no problem, everything else ok?" VALENCIA asked JONES if "LA MONA" called him and JONES stated that "some lady, Spanish lady" had called him on his other phone. VALENCIA asked

124. On July 22, 2002, at approximately 6:17 p.m., LUCHO using **Target Phone IV** called KELLY JONES on **Target Phone III**. LUCHO told JONES that he was on Damen Avenue at "Las Tapas", and JONES told LUCHO to wait there. At approximately 6:20 p.m., a surveillance agent arrived in that area and observed the Chrysler Sebring, with Illinois license plate number 2512007 and driven by a Hispanic male, traveling west on Irving Park Road from Damen Avenue. The insurance for this vehicle comes back to CARLOS JIRON (LUCHO). Surveillance team members established a fixed surveillance throughout the immediate area of Damen and Irving Park, but were unable to locate JONES or the Chrysler Sebring vehicle.

125. On July 23, 2002, at approximately 1:36 p.m., VALENCIA called KELLY JONES on **Target Phone I**. VALENCIA instructed JONES to go to "MARTICA" [MARTHA LLANOS] and JONES asked "where, which one?" VALENCIA told JONES to go to "her house" and JONES stated that he had not been there in a long time and then said "ok, no problem". VALENCIA told JONES to go to "MARTICA's" [MARTH LLANOS'] house at 6:00 p.m. JONES asked VALENCIA if he should take care of everything and VALENCIA replied yes, everything thirty-five [amount of money]. JONES then told VALENCIA that he (JONES) had given LUCHO ten [amount of money] and had fifty left over. VALENCIA asked JONES "and what about you?", and JONES replied "I'll take a

"when, today?" and JONES replied "yeah, like maybe a half hour ago". VALENCIA then instructed JONES to give only ten [amount of money] to LUCHO and thirty-five for "the girl".

little for me and then take the rest to her [MARTHA LLANOS]". VALENCIA then stated "ok, forty-five" [amount of money]. Affiant believes that VALENCIA instructed KELLY JONES to bring LLANOS the drug proceeds, and JONES later explained to VALENCIA how he distributed a portion of the proceeds.

126. On July 23, 2002, at approximately 7:00 p.m., KELLY JONES using **Target Phone III** called LUCHO on **Target Phone IV**. LUCHO told JONES that "Martica" [MARTHA LLANOS] needed him (JONES), and JONES replied that he was on his way to her (LLANOS') house. LUCHO stated "alright, I'm here with her now".⁴⁴ JONES stated that he would get there in thirty minutes.

127. On July 23, 2002, surveillance was established in the area of 4522 N. St. Louis, Chicago, Illinois, the residence of MARTHA LLANOS.⁴⁵ Based on the above intercepted telephone conversation, it was determined that KELLY JONES was going to meet with MARTHA LLANOS at her residence in order to drop off currency, believed to be about \$43,000 in drug proceeds].⁴⁶ At approximately

⁴⁴The investigation has shown that MARTHA LLANOS owns or operates wire remitter businesses in the Chicago area. Subpoenaed telephone records for LaKayana Express, at 2952 W. Montrose, Chicago, Illinois, a wire remitter business, is listed in the name of "Martha L. Llanos". Moreover, Multi Service, another wire remitter business located at 3640 West Montrose, Chicago, Illinois, is listed in the name of "Martha L. Llanos."

⁴⁵This is based on surveillance and subpoenaed phone records.

⁴⁶On July 25, 2002, at approximately 4:38 p.m., KELLY JONES was called by VALENCIA on **Target Phone III**. During this call,

6:20 p.m., surveillance agents observed LUCHO's Chrysler Sebring parked in front of 4522 N. St. Louis. LUCHO exited the driver's side door, carrying a black leather purse or bag and a notebook, and walked directly into the residence.

128. On July 23, 2002, at approximately 7:44 p.m., surveillance agents observed a Lincoln Navigator, bearing Illinois license plate 1353415 (previously identified as belonging to KELLY JONES) parked in front of 4522 N. St. Louis. Upon arriving an unidentified passenger was sitting in the front seat of the Navigator. KELLY JONES was observed exiting the driver's side door carrying a white plastic grocery bag with a box inside of the bag. JONES was observed entering the residence. Shortly thereafter, LUCHO was observed leaving the residence and walking to his vehicle while utilizing a cellular telephone.

129. On July 23, 2002, at approximately 7:49 p.m., a surveillance agent observed KELLY JONES exit the front door of MARTHA LLANOS' residence and approach the tan Chrysler Sebring. LUCHO opened the driver's side door and the two (JONES and LUCHO) appeared to shake hands and engage in a brief conversation. JONES and LUCHO then departed the area in their respective vehicles. Affiant believes that LUCHO delivered drug proceeds to LLANOS at her house, and later JONES arrived at that house to deliver drug

JONES informed VALENCIA that he had given 10 [amount of money] to LUCHO, 43 [amount of money] to Martica [MARTHA LLANOS], and he kept 7 [amount of money] for himself.

proceeds as well.

Drug Shipment From Florida to Chicago
August 20 - 23, 2002

130. As set forth below, from on or about August 20 through August 23, 2002, KELLY JONES was instructed by JAMES VALENCIA to send drug couriers (later identified as MARCUS JONES and ANGEL MELENDEZ, JR.) to Florida to pick up heroin. MELENDEZ and MARCUS JONES drove to Florida to drop off drug money and obtain heroin from "TOMATICO" (later identified as JESUS ABEL ROLDAN). MELENDEZ and JONES then brought the heroin back to Chicago on behalf of the organization.

131. On August 20, 2002, at approximately 1:03 p.m., KELLY JONES received a call from James VALENCIA on **Target Phone I**. During this conversation, VALENCIA told JONES to send someone to the "beach" [send a drug courier to Florida].

132. On August 20, 2002, at approximately 6:17 p.m., KELLY JONES using **Target Phone I** called ANGEL MELENDEZ, JR. at 773-430-8168. During this conversation, JONES stated to MELENDEZ "later on just count this [count money that was to be delivered to Miami, Florida to an unknown subject], just in case I might of miscounted". JONES further stated "T's [MARCUS JONES] ready, the car's ready, everything's ready bro" [ready for MELENDEZ and MARCUS JONES to drive to Miami, Florida to deliver money and pick up heroin for the organization]. MELENDEZ stated to JONES that he

(MELENDEZ) wanted to leave "ASAP".

133. On August 20, 2002, at approximately 7:49 p.m., KELLY JONES received a call on **Target Phone I** from MARCUS JONES. During this call, MARCUS JONES asked KELLY JONES if "there suppose to be fifteen (15) stacks here [stacks of money]"? MARCUS JONES continued to state that he counted fifteen-nine (15-9). KELLY JONES then told MARCUS JONES to leave as soon as MELENDEZ arrived. KELLY JONES also advised MARCUS JONES that the contact number for the person in Florida (ROLDAN) was stored on the cellular telephone that was stolen [**Target Phone II**]. KELLY JONES stated that he (Kelly) would call Marcus JONES later and give him the information [the telephone number for ROLDAN in Florida].

134. On August 20, 2002, at approximately 8:56 p.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ, JR. During this call, MELENDEZ advised JONES that they were "on the road" [on their way to Florida].

135. On August 21, 2002, at approximately 12:13 p.m., KELLY JONES received a call from MELENDEZ, JR. on **Target Phone I**. MELENDEZ advised JONES that they [MELENDEZ and MARCUS JONES] had just crossed from Georgia and entered the "State of the beach" [Florida]. MELENDEZ further advised that the estimated time of arrival to their destination was 5:00 - 5:30. JONES then advised MELENDEZ that he (JONES) would give MELENDEZ "the numbers and everything" [the contact telephone number for ROLDAN in Florida].

136. On August 21, 2002, at approximately 2:02 p.m., KELLY JONES made a call to LUCHO using **Target Phone III**. During this conversation, KELLY JONES asked LUCHO, "who is going to the beach [Florida]? TOMATICO"? LUCHO replied "yes, TOMATICO" (ROLDAN). JONES then asked LUCHO for "TOMATICO's" number. LUCHO then told JONES that he (LUCHO) had to find the number and told JONES to call him (LUCHO) back.

137. On August 21, 2002, at approximately 2:19 p.m., KELLY JONES again called LUCHO using **Target Phone III**. LUCHO told JONES to write the number down, and proceeded to give JONES the number, 786-543-9342 [for ROLDAN].

138. On August 21, 2002, at approximately 2:20 p.m., KELLY JONES made a call to "TOMATICO" (ROLDAN) using **Target Phone III**. JONES advised "TOMATICO" (ROLDAN) that his (JONES') "friends" [couriers MELENDEZ and MARCUS JONES] would arrive between 5:30-6:00.

139. On August 21, 2002, at approximately 3:03 p.m., KELLY JONES made a call to JAMES VALENCIA using **Target Phone III**. During this conversation, VALENCIA asked JONES if he (JONES) had sent his "brother" [MARCUS JONES]. JONES replied that he did. JONES further advised VALENCIA that he (JONES) spoke with "TOMATICO" (ROLDAN) and advised him of what time MELENDEZ and MARCUS JONES would arrive.

140. On August 21, 2002, at approximately 3:39 p.m., KELLY

JONES received a call from "TOMATICO" (ROLDAN) on **Target Phone III**. During this conversation, ROLDAN asked JONES what time his "cousin" was arriving. JONES stated "at 6:00 p.m."

141. On August 21, 2002, at approximately 5:49 p.m., KELLY JONES received a call from MARCUS JONES on **Target Phone I**. During this call, Marcus JONES asked Kelly JONES for the "number". Kelly JONES then relayed "786-543-9342" [number for ROLDAN]. Kelly JONES further instructed Marcus JONES to "tell Angel [MELENDEZ, JR.] to talk to that TOMATICO" (ROLDAN). Kelly JONES continued to advise Marcus JONES to "put it [heroin] in the thing [hidden compartment inside the vehicle used by Marcus JONES], because he (ROLDAN) doesn't have the radio [boom-box style portable stereo used to transport heroin]".

142. On August 21, 2002, at approximately 7:12 p.m., KELLY JONES made a call to "TOMATICO" (ROLDAN) using **Target Phone III**. During this conversation, JONES asked "TOMATICO" if everything was okay. "TOMATICO" advised JONES that everything was fine.

143. On August 22, 2002, at approximately 1:50 p.m., KELLY JONES made a call to Marcus JONES and MELENDEZ using **Target Phone I**. During this conversation, MELENDEZ advised KELLY JONES that they were "chillin in Miami". MELENDEZ then advised KELLY JONES that he (MELENDEZ) was kidding, and that they [MELENDEZ and MARCUS JONES] were in Indiana, about two hours from Chicago, Illinois. JONES instructed MELENDEZ to return to JONES' house upon their

arrival in Chicago.

144. On August 22, 2002, at approximately 4:38 p.m., KELLY JONES made a call to JAMES VALENCIA using **Target Phone III**. VALENCIA asked JONES about his brother [MARCUS JONES]. JONES advised VALENCIA that they [MELENDEZ and MARCUS JONES] would arrive later that day.

145. On August 22, 2002, at approximately 5:01 p.m., KELLY JONES made a call to MELENDEZ using **Target Phone I**. During this call, MELENDEZ advised KELLY JONES that everything went smooth, and that they did not have to stop in Miami. JONES then stated that he was not home. MELENDEZ then asked JONES where he wanted him (MELENDEZ) to "put the stuff" [heroin picked up in Florida]. JONES instructed MELENDEZ to put it [heroin] "in the book bag that's in the back room". JONES continued to advise MELENDEZ to then "put the book bag like behind the entertainment center".

146. On August 22, 2002, at approximately 5:06 p.m., KELLY JONES made a call to 347-724-6296 using **Target Phone III**. This number is believed to be used by New York Supplier. JONES left a message that "everything is fine".

147. On August 22, 2002, at approximately 5:08 p.m., KELLY JONES received a call from New York Supplier on **Target Phone III**. JONES advised New York Supplier that he was trying to call the person (ROLDAN) from the "beach" [Florida] and confused the numbers.

148. On August 22, 2002, at approximately 5:09 p.m., KELLY JONES made a call to "TOMATICO" (ROLDAN) using **Target Phone III**. During this conversation, JONES advised "TOMATICO" that "everything is fine". JONES continued to state that "my friends" [MELENDEZ and MARCUS JONES] are back in Chicago, Illinois.

149. On August 23, 2002, at approximately 3:00 p.m., KELLY JONES made a call to JAMES VALENCIA using **Target Phone III**. During that conversation, JONES advised VALENCIA that his brother, Marcus JONES, returned and that everything was okay.

Drug Shipment from Florida to Chicago
August 30 - September 5, 2002

150. On August 30, 2002, at approximately 3:07 p.m., KELLY JONES received a call from VALENCIA on **Target Phone III**. During this conversation, VALENCIA advised JONES to send couriers to "La Playa" [Miami]. JONES confirmed with VALENCIA that he was to send his couriers to "La Playa" [Miami], and told VALENCIA that he (JONES) would "take care of it".

151. On August 30, 2002, at approximately 3:10 p.m., KELLY JONES made a call to Marcus JONES on **Target Phone I**. During this conversation, KELLY JONES advised Marcus JONES that he (Kelly) needed "to get the car ready 'cause then somebody's gotta go today or tomorrow" [JONES wanted to prepare the Nissan Altima for travel to Florida].

152. On August 31, 2002, at approximately 11:34 a.m., KELLY

JONES received a call on **Target Phone I** from Yolanda RIVERA. During that conversation, RIVERA advised JONES that she could be ready at around 3:00 p.m. JONES asked RIVERA if that was "the earliest you can get out here"? RIVERA responded, "yeah, cause I gotta pack, then I'm gonna have to get to the city". JONES continued to advise RIVERA, "I'll have the car whatever, you know, and if anything Angel [MELENDEZ] can just pick you up and ya' can ride out".

153. On August 31, 2002, at approximately 4:13 p.m., KELLY JONES made a call to NATHAN THOMAS over **Target Phone I**. JONES asked THOMAS what he was doing. THOMAS advised JONES that he had to pick his girlfriend up from work later. JONES stated "why don't you give her some money to take a cab home, you can go on this mission with "Cuzo" [YOLANDA RIVERA]. THOMAS replied "all right".

154. On August 31, 2002, at approximately 7:46 p.m., KELLY JONES received a call on **Target Phone III** from JAMES VALENCIA. JONES advised VALENCIA that "my brother [couriers] be there tomorrow, see my car broke down, so I had to get it fixed today, this morning, so they left this morning".

155. On August 31, 2002, at 8:48 P.M., JONES received a call on **Target Phone I** from NATAN THOMAS. During that conversation JONES and THOMAS discuss the best route to Florida, and JONES complains to THOMAS that THOMAS is not taking the best route.

156. On August 31, 2002, at approximately 9:22 p.m., KELLY

JONES made a call on **Target Phone I** to William Anthony MORCIGLIO. During that conversation, JONES complained to MORCIGLIO about THOMAS. JONES stated "why do I keep giving him chances"? JONES then explained to MORCIGLIO that "CUZO" [RIVERA] and MELENDEZ were supposed to travel to Florida, but then MELENDEZ backed out, so JONES contacted THOMAS.

157. On September 1, 2002, at approximately 4:53 p.m., KELLY JONES received a call on **Target Phone I** from THOMAS. During this call, THOMAS advised JONES that they were "about a half an hour" from their destination. THOMAS then asked JONES "where do I gotta go"? At that time JONES is overheard telling David ACEVEDO to "tell Nate [NATHAN THOMAS] where to, where to . . ." ACEVEDO then relayed the directions to THOMAS. ACEVEDO later stated, "you're gonna pass like a dealership and all that shit and then just go by there's a McDonald's, you bust a right as soon as you get off of the E-way, you are gonna see a McDonald's. And just hit him up when you get there".

158. On September 1, 2002, at approximately 6:45 p.m. (EST), agents initiated surveillance at the Palm Plaza shopping center located on the corner of 167th Street and 67th Avenue in Miami Lakes, Florida. At approximately 7:15 p.m. (EST), agents observed a white Nissan Altima bearing Illinois license plate number 310 4374 (registered to Kelly M. JONES) park in front of the McDonalds restaurant. Agents observed NATHAN THOMAS and YOLANDA RIVERA exit

the Altima, walk into the McDonalds, and then reenter the Altima. Agents also observed THOMAS and RIVERA speaking on cellular telephones as they walked between the McDonalds and the adjacent Citgo gas station.

159. On September 1, 2002, at approximately 6:27 p.m. (CST), KELLY JONES received a call on **Target Phone I** from THOMAS. During this call, as JONES and THOMAS begin to talk, JONES received a call on another phone. JONES is overheard stating, "hey Papo, what's up? Yes, my friend is there. Yes, yes, he has a seven (7) zero (0) eight (8) number". JONES then returned to THOMAS, stating "call him, call the motherfucker".

160. On September 1, 2002, at approximately 6:34 p.m. (CST), JONES spoke with RIVERA on **Target Phone I**. During that conversation, RIVERA advised JONES that they tried to contact the subject (JESUS ROLDAN) in Florida, but "he hung up". RIVERA further stated to JONES, "dude hung up on us. So why don't you call him and tell him we're at Palm Plaza on sixty-seventh (67th), the McDonald's". JONES then stated, "all right, I'm going to call you right back".

161. On September 1, 2002, at approximately 8:11 p.m. (CST), JONES received a call on **Target Phone III** from "TOMATICO" [Jesus Abel ROLDAN]. ROLDAN asked JONES, "what happened, talk to this guy, that he doesn't call or nobody showing up"? JONES then stated, "huh, so this hasn't happened"? ROLDAN advised JONES that

"she called me, and we said we'd meet at McDonald's, and I went to wait at McDonald's and no one has arrived". At that time, JONES handed the phone to WILLIAM MORCIGLIO, who then spoke with ROLDAN. MORCIGLIO asked ROLDAN what happened. ROLDAN advised MORCIGLIO that "I went over there, waiting and nothing". MORCIGLIO then asked, "you see them? Mi cousin, did you see him"? ROLDAN again advised that he was at the location but did not see anyone. MORCIGLIO then advised ROLDAN that he (MORCIGLIO) would "call him right now, to see what's up". ROLDAN stated, "okay, have him call me from a public phone".

162. On September 1, 2002, at approximately 8:46 p.m. (CST), William MORCIGLIO made a call on **Target Phone III** to ROLDAN. MORCIGLIO asked ROLDAN if he had "heard from my cousin or what"? ROLDAN advised MORCIGLIO that "oh, mi'jo, he called me and said to, said to meet with him at McDonald's, and I told him to meet in half an hour, and I went to wait there, and he did not get there". ROLDAN told MORCIGLIO that "I already passed by, I passed by about four (4) times, I don't want to pass by too much".

163. On September 1, 2002, at approximately 9:12 P.M. (CST), KELLY JONES received a call on **Target Phone I** from THOMAS. THOMAS advised JONES that "this shit is ridiculous folks, I cannot talk to the fuckin guy [ROLDAN], bro". MORCIGLIO then took the phone from KELLY JONES and spoke with THOMAS. MORCIGLIO asked THOMAS "what the fuck! What's up man"? THOMAS stated, "how the fuck do you

expect me to fuckin talk to this guy [ROLDAN] if he can't speak a fuckin lick of English"? MORCIGLIO then told THOMAS that he (MORCIGLIO) would call "TOMATICO" [ROLDAN] and tell him where THOMAS was. MORCIGLIO then confirmed that THOMAS was at the McDonald's on 67th Street.

164. On September 1, 2002, at approximately 9:13 P.M. (CST), JONES received a call from ROLDAN. ROLDAN advised JONES to "listen, tell (U/I) to call me, because we are here waiting for those assholes, you understand what I'm telling you"? JONES then put WILLIAM MORCIGLIO back on the phone to speak with ROLDAN. MORCIGLIO advised ROLDAN that "he's [THOMAS] eating at the McDonald's". ROLDAN told MORCIGLIO to tell THOMAS to "come outside". MORCIGLIO described THOMAS's physical appearance to ROLDAN. ROLDAN then asked MORCIGLIO what kind of car THOMAS was driving, and what color it was. MORCIGLIO advised that it was a "white one".

165. On September 1, 2002, at approximately 10:15 p.m. (EST), SAIC/Miami Agents again initiated surveillance of the McDonalds restaurant located on the corner of 167th Street and 67th Avenue in Miami Lakes, Florida. At approximately 10:30 p.m. (EST), agents observed THOMAS and RIVERA in the same Nissan Altima parked in the parking lot of the Citgo gas station adjacent to the McDonalds restaurant. Shortly thereafter, Agents observed a white Honda Accord bearing Florida temporary license plate number F232477 park

perpendicular to the Altima at the gas pump. Agents then observed THOMAS exit the Altima, walk to the Accord, and speak with the male inside the Accord. At that point, agents observed both the Altima and the Accord depart the Citgo gas station and drive toward the Dry Cleaners USA store inside the Palm Plaza shopping center. Both vehicles drove the wrong way on a one-way road behind the Dry Cleaners USA. Shortly thereafter, agents observed the Altima drive toward the front of the Dry Cleaners USA to exit the Palm Plaza shopping center while the Accord drove out a back alley of the Dry Cleaners USA. Agents observed the Altima depart the area. Agents also observed the Accord depart the area after making a U-turn on 67th Avenue.

166. On September 1, 2002, at approximately 10:05 p.m. (CST), KELLY JONES made a call on **Target Phone I** to RIVERA. RIVERA advised JONES that "everything is all good" [RIVERA and THOMAS successfully picked up the heroin].

167. On September 2, 2002, at approximately 8:18 p.m., KELLY JONES made a call on **Target Phone III** to JAMES VALENCIA. JONES advised VALENCIA that "my friend, you know, my friends [THOMAS and RIVERA] not coming back til, ah, maybe Wednesday, okay, their car broke down".

168. On September 3, 2002, at approximately 1:18 p.m., KELLY JONES placed a call on **Target Phone III** to JAMES VALENCIA. JONES stated that he was on his way to do "that" [narcotics-related work]

at that time. VALENCIA responded "Okay, and 'Martica' [Martha LLANOS], too, nine hundred (900)[heroin quantity]". JONES stated that he would give "everything" [heroin quantity] and that he would go by "her" [LLANOS] house.

169. On September 3, 2002, at approximately 4:10 p.m., KELLY JONES placed a call on **Target Phone III** to LUCHO. LUCHO stated that "Piecito Malo" [LLANOS] had been calling and she needed JONES. JONES asked "who, 'Martica' [LLANOS]", which LUCHO confirmed. LUCHO provided LLANOS' number as 562-7316. JONES stated that he was three (3) minutes from her house. LUCHO stated that LLANOS was at her business on Montrose and that JONES should call her because "she's desperate".

170. On September 3, 2002, at approximately 4:18 p.m., KELLY JONES placed a call on **Target Phone I** to LLANOS at (773) 562-7316. LLANOS stated that she was at the store. JONES stated that he was near St. Louis [LLANOS' residence street address]. JONES and LLANOS agreed to meet at LLANOS' residence.

171. On September 3, 2002, at approximately 4:37 p.m., surveillance agents in the area of 4522 N. St. Louis Avenue (residence of LLANOS) observed JONES driving a black Chevy Malibu bearing Illinois license plate number J290301 southbound on St. Louis Avenue from Sunnyside Avenue. At approximately 4:38 p.m., agents observed JONES park the black Malibu in the front of 4522 N. St. Louis and exit the vehicle. JONES was observed walking to the

door of the residence carrying a white plastic bag in his right hand. JONES entered the residence. At approximately 4:43 p.m., surveillance units observed JONES exiting the residence carrying an unknown object in his hand and entering the drivers seat of the black Malibu. The black Malibu driven by JONES then proceeded southbound on St. Louis away from the location.

172. On September 3, 2002, at approximately 5:01 p.m., KELLY JONES called JAMES VALENCIA. During this call, JONES stated "I see Martica, you know, I pass, I pass her, I pass her everything [delivered heroin quantity to LLANOS]". VALENCIA later asked JONES "when is the guy [couriers RIVERA and THOMAS] coming, tomorrow, yes"? JONES responded "yeah, afternoon, tomorrow afternoon".

173. On September 4, 2002, at approximately 4:25 p.m., KELLY JONES received a call on **Target Phone I** from JAMES VALENCIA. VALENCIA asked JONES if everything was "okay". JONES advised VALENCIA that everything was fine, "I just got a call, they are eh, in Tennessee". VALENCIA stated "oh, oh okay, but they got the stuff [heroin quantity] right now"? JONES replied that they did. VALENCIA told JONES to call him when "it's [heroin quantity] there, okay".

174. On September 5, 2002, at approximately 2:26 a.m., surveillance units observed a white Nissan Altima bearing Illinois license plate 3104374 arrive at 1433 Warner Street in Chicago, Illinois (residence of KELLY JONES). Agents observed a Hispanic

male, matching the description of THOMAS, exit the vehicle with a large white (pillowcase) size package. Agents videotaped the male exiting the vehicle. Agents observed JONES and an unidentified individual exit the residence. JONES, the unknown individual, and the male matching the description of THOMAS met in front of the residence. At approximately 2:38 a.m., the individual matching the description of THOMAS entered the passenger side of the Altima and retrieved an unknown object inside of the car. At approximately 3:00 a.m., JONES, the unknown individual, and the Hispanic male matching the description of THOMAS, entered 1433 Warner Street, Chicago, Illinois.

175. On September 5, 2002, at 8:09 a.m., KELLY JONES made a call on **Target Phone I** to DAVID ACEVEDO. KELLY JONES advised ACEVEDO that he, Marcus JONES and WILLIAM MORCIGLIO were going to do "lab work" [processing heroin delivered by THOMAS and RIVERA].

176. On September 5, 2002, at approximately 9:41 a.m., KELLY JONES received a call from YOLANDA RIVERA. RIVERA asked JONES if THOMAS made it to his house. JONES advised RIVERA that "yeah, like at 3:00 a.m."

177. On September 6, 2002, at approximately 2:56 p.m., KELLY JONES received a call on **Target Phone III** from Ricardo ARNOLD. ARNOLD asked JONES if he (JONES) could "slide five (5) [heroin quantity] on me". JONES responded "yeah" and asked if ARNOLD needed it right away. ARNOLD stated that he was coming to JONES'

residence and would call on the way.

178. On September 6, 2002, at approximately 4:55 p.m., surveillance units in the area of 1433 W. Warner observed ARNOLD parked across from 1433 Warner Street in a 1995 Chevy Lumina, Illinois license plate number 2267903. The vehicle was parked on the North side of the street facing West. At approximately 5:10 p.m., agents observed KELLY JONES park his black Lincoln Navigator on Greenvview Street. Agents observed JONES, Individual B, and two small children walk towards the residence in the alley. At approximately 5:35 p.m., agents observed KELLY JONES exit 1433 Warner Street and walk across the street towards ARNOLD. Agents observed ARNOLD and JONES entering 1433 Warner Street residence. At approximately 5:46 p.m., agents observed ARNOLD exit 1433 Warner Street. ARNOLD was observed with his right hand in his front pocket. ARNOLD entered his vehicle and left the area.

**Drug Shipment From Florida to Chicago
September 15-16, 2002**

179. On September 12, 2002, at approximately 10:05 a.m., LUCHO placed a call from **Target Phone VI** to JAMES VALENCIA. During this conversation, VALENCIA told LUCHO (JIRON) to remember that the two "guys" [drug couriers] are coming in this weekend. LUCHO stated that he would call VALENCIA in a little while so that they (VALENCIA and LUCHO) could make arrangements about that.

180. On September 14, 2002, at approximately 10:00 P.M., LUCHO received a call on **Target Phone VI** from (773) 833-5899 and spoke

with Iris D. TORRES. LUCHO asked TORRES if she had already spoken with Individual F [unidentified courier]. TORRES stated that she had and that "everything's okay". LUCHO stated that he (Individual F) would be going to TORRES' house. TORRES stated "he already got here". LUCHO (JIRON) stated that he would call her the following morning so she can pick up another "cousin of mine" [courier]. LUCHO continued "he's not the one who came the other time" [not the same courier]. LUCHO also stated that he would call TORRES because "they'll give me his telephone number to call him in the morning, so you can see him". TORRES asked when LUCHO was going to stop by. LUCHO stated that he would be coming the following day "because I've got to pick up all the CD's at once because the party is tomorrow" [JIRON will pick up the entire shipment of heroin at once for distribution]. In addition, LUCHO stated that some of the CD's [heroin quantity] are "scratched" [not ready for distribution] and "have to go to be cleaned with your friend" [some of the heroin needs to be processed for distribution].

181. On September 15, 2002, at approximately 9:26 a.m., LUCHO placed a call on **Target Phone VI** to an unidentified number, and spoke with Individual C. Individual C stated that he was going to give LUCHO "the information" [information related to the drug courier]. Individual C provided the telephone number (847) 635-1300 and the room number 155. Individual C told LUCHO that the "man's" [courier] name is "Ruben" [RUBEN CHAPARRO-RAMOS] and that

he was at the Comfort Inn. Individual C further provided the address of 2175 E. Touhy Avenue. Individual C told LUCHO to call RUBEN and "tell him you're on your way".

182. On September 15, 2002, at approximately 9:29 a.m., LUCHO placed a call from **Target Phone VI** to "RUBEN" [CHAPARRO-RAMOS] at (847) 635-1300. LUCHO then dialed room number 155. LUCHO told "RUBEN" that "IRIS" [IRIS D. TORRES] was going to stop by to pickup some "CD's" [heroin quantity] and that she was going to call him (CHAPARRO-RAMOS) so they (CHAPARRO-RAMOS and TORRES) could meet in half an hour to an hour.

183. On September 15, 2002, at approximately 9:37 a.m., LUCHO received a call on **Target Phone VI** from (773) 317-9233. During this conversation, LUCHO spoke with "NEGRITA" (SANDRA P. VELAZQUEZ). LUCHO stated that he already talked with "the guys" [couriers] and stated that he could see "NEGRITA" in the afternoon or for breakfast. "NEGRITA" told LUCHO to call when he was ready so that she could get ready. LUCHO agreed and added that he thought that two (2) "CD's" [heroin quantity] are "ready" [available for distribution] and that two (2) "CD's" [heroin quantity] are "scatched" [not yet available for distribution].

184. On September 15, 2002, at approximately 11:05 a.m., surveillance agents in and around the Comfort Inn observed CHAPARRO-RAMOS exit room 155. CHAPARRO-RAMOS returned to his room after walking to the Mobil gas station across the street. At

approximately 11:14 a.m., surveillance agents observed CHAPARRO-RAMOS exit his room and walk to the front of the Comfort Inn. CHAPARRO-RAMOS was also observed utilizing his cellular telephone. Shortly thereafter, surveillance units observed a white Toyota in the parking lot of the hotel. This vehicle is registered to the an individual with an address of 4715 W. McLean, Chicago, Illinois. This vehicle was driven by a Hispanic female and another female was observed in the passenger seat. At approximately 11:15 A.M., surveillance agents observed CHAPARRO-RAMOS return to his room and retrieve a red box. An agent observed CHAPARRO-RAMOS return to the Toyota and place the box in the trunk of the Toyota. The Toyota then departed the parking lot of the Comfort Inn, followed by surveillance units.

185. On September 15, 2002, at approximately 11:21 a.m., LUCHO placed a call from **Target Phone VI** to (847) 635-1300. During this conversation, LUCHO told "RUBEN" (CHAPARRO-RAMOS) that "the lady" (IRIS TORRES) is close by and that she (IRIS TORRES) is almost there.

186. On September 15, 2002, at approximately 11:25 a.m., LUCHO placed a call from **Target Phone VI** to (773) 317-9233. During this conversation, LUCHO spoke with "NEGRITA" (SANDRA P. VELAZQUEZ). LUCHO asked "NEGRITA" if they could meet the following morning because some of the "clothes" [heroin] came in "unironed" [not available for distribution]. LUCHO and "NEGRITA" agreed to meet

the following morning at approximately 7:00 a.m.

187. On September 15, 2002, at approximately 11:50 a.m., LUCHO placed a call from **Target Phone VII** to (773) 851-8640. During this conversation, LUCHO spoke with "IRIS" [IRIS D. TORRES]. LUCHO asked if she had spoken with "him" [drug courier] already or not. TORRES stated that they were talking at that time.

188. On September 15, 2002, at approximately 11:51 a.m., LUCHO placed a call from **Target Phone VII** to (646) 262-4421. During this conversation, LUCHO told Individual C that "she" (IRIS TORRES) was at the hotel. LUCHO confirmed it was "IRIS."

189. During this time period, surveillance units in the area of the Comfort Inn located at 2175 E. Touhy observed an individual later identified as RUBEN CHAPARRO-RAMOS carrying a box out of room 155. CHAPARRO-RAMOS then exited the hotel with the box and approached a vehicle occupied by two (2) females. Surveillance then followed the vehicle to the area of 4715 W. McLean Street in Chicago, which is believed to be the residence of IRIS D. TORRES.

190. On September 15, 2002, at approximately 12:28 p.m., LUCHO received a call on **Target Phone VII** from VALENCIA at an unidentified telephone number. During this conversation, LUCHO stated that "Natacha" [believed to be CHAPARRO-RAMOS] and another person also believed to be a drug courier arrived. LUCHO also stated that he spoke with "NEGRITA" (VELAZQUEZ) and that they (LUCHO and VELAZQUEZ) agreed to meet tomorrow.

191. On September 15, 2002, at approximately 9:08 p.m., LUCHO received a call on **Target Phone VI** from (773) 833-5899. During this conversation, LUCHO spoke with "IRIS" [IRIS D. TORRES]. LUCHO asked if they could meet at 6:00 a.m. the following morning. TORRES stated that she could not because she had a lot of things to do the following day.

192. On September 15, 2002, at approximately 9:10 p.m., LUCHO placed a call on **Target Phone VI** to (773) 317-9233. LUCHO told "NEGRITA" (VELAZQUEZ) that the lady [TORRES] "is telling me that I can't to eat with you at seven (7:00) o'clock tomorrow morning [TORRES cannot meet to deliver the heroin to LUCHO and therefore LUCHO cannot deliver the heroin to VELAZQUEZ]. LUCHO stated that "the clothes [heroin quantity] I have for you, you know, the ones that are ironed [ready for distribution] are ready but I just called the lady [TORRES] that is supposed to give me that [heroin quantity] tomorrow morning and she said she can't do it at six (6) o'clock in the morning".

193. On September 16, 2002, at approximately 8:27 a.m., LUCHO received a call on **Target Phone VI** from (773) 317-9233. LUCHO and "NEGRA" (VELAZQUEZ) agreed to meet at approximately 10:00 a.m. LUCHO added "I'll give you the oven [container for heroin quantity] and then you'll give me the little oven [container] so the guys [couriers] can . . . So we can put receipts [currency] in there too . . ."

194. On September 16, 2002, at approximately 8:46 a.m., LUCHO placed a call on **Target Phone VI** to (773) 637-8271. LUCHO told IRIS D. TORRES that he was on his way over "there" (to TORRES' residence).

195. On September 16, 2002, at approximately 9:30 a.m., surveillance units in the area of 4715 W. McLean Street (near the residence of IRIS TORRES) in Chicago, observed a vehicle previously identified during the investigation as a vehicle driven by LUCHO parked on the east side of the residence. At approximately 9:40 a.m., surveillance units observed LUCHO's vehicle departing the area northbound on Cicero Avenue.

196. On September 16, 2002, at approximately 9:58 a.m., LUCHO placed a call from **Target Phone VI** to (773) 317-9233. LUCHO told "NEGRITA" (VELAZQUEZ) that he (LUCHO) would arrive in five (5) to six (6) minutes.

197. On September 16, 2002, at approximately 10:05 a.m., surveillance units observed LUCHO's vehicle parked in the west alley of the 5700 block of North St. Louis Avenue [believed to be VELAZQUEZ' residence]. The hatchback of the vehicle was open and surveillance observed LUCHO carrying a box east through the alley.

198. On September 16, 2002, at approximately 11:19 a.m., LUCHO placed a call from **Target Phone VI** and spoke with JAMES VALENCIA. LUCHO states "I already spoke to 'NEGRITA' [VELAZQUEZ] and I gave her what I had ironed out [heroin prepared for distribution], which

was 2260 [heroin quantity]".

Drug Shipment From Florida to Chicago
September 16 - 20, 2002

199. On September 16, 2002, at approximately 2:52 p.m., KELLY JONES made a telephone call on **Target Phone I** to ANGEL MELENDEZ, JR. During this conversation, JONES asked MELENDEZ if he "feel like doin' something?" JONES further asked MELENDEZ if he wanted to go "somewhere and getting a tan?" [travel to the Miami, Florida area to pick up heroin for the organization and transport the drugs back to Chicago]. MELENDEZ stated that "you got the number, bro. Whenever you get word, just hit me up . . ." JONES asked MELENDEZ who would accompany him on the trip and Melendez replied, "most likely Dave" [DAVID ACEVEDO, who during the investigation has been observed making drug-related trips between Chicago and New York on behalf of the organization].

200. On September 17, 2002, at approximately 2:48 p.m., KELLY JONES using **Target Phone I** called MELENDEZ. During this conversation, JONES told MELENDEZ that he would find out about the "mission" [narcotics-related trip] as soon as he talked with his "guy". JONES asked MELENDEZ if he was still interested in taking the trip, and MELENDEZ stated that he was.

201. On September 18, 2002, at approximately 8:07 a.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ. During this conversation, MELENDEZ told JONES that his "girl" would be

traveling with him. JONES and MELENDEZ also discussed traveling in the "white car" [white Nissan Altima registered to JONES which has been used by the organization's drug couriers on prior drug-related trips].

202. On September 18, 2002, at approximately 6:46 p.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ. During this conversation, JONES asked MELENDEZ where he was. MELENDEZ stated that he was near Atlanta. JONES asked if everything is "running smoothly". JONES instructed MELENDEZ to "check in every couple hours, bro".

203. On September 18, 2002, at approximately 10:30 p.m., KELLY JONES called LUCHO using **Target Phone I**. During this conversation, LUCHO provided JONES with two telephone numbers, each having a Florida area code.

204. On September 19, 2002, at approximately 7:27 a.m., KELLY JONES called MELENDEZ using **Target Phone I**. During this conversation, MELENDEZ told JONES that he (MELENDEZ) had been doing a majority of the driving. MELENDEZ informed JONES that they were near Ft. Lauderdale, Florida. JONES asked MELENDEZ to call him (JONES) when he "get over there", so JONES could give him (MELENDEZ) the Florida contact phone number.

205. On September 19, 2002, at approximately 9:38 a.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ. During this conversation, MELENDEZ told JONES he was at the McDonald's

restaurant and wants "o' boys" phone number. JONES provided MELENDEZ with the number (786) 543-9360.

205. On September 19, 2002, at approximately 9:42 a.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ. During this conversation, MELENDEZ told JONES that the phone he was trying to call is turned off. JONES told MELENDEZ, "give me a minute let me call him. Let me see what I can do".

206. On September 19, 2002, at approximately 9:49 a.m., KELLY JONES called MELENDEZ on **Target Phone I**. During this conversation, JONES provided MELENDEZ with the phone number (786) 546-6891. MELENDEZ stated that he would, "hit him up right now". JONES instructed MELENDEZ to call him (JONES) back.

207. On September 19, 2002, at approximately 10:06 a.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ. During this conversation, MELENDEZ told JONES that they were going to "have lunch" with an individual. MELENDEZ further told JONES that he (MELENDEZ) would call JONES in one and a half hours.

208. On September 19, 2002, at approximately 12:35 p.m., KELLY JONES received a voice mail message on **Target Phone I** from MELENDEZ. During the message, MELENDEZ informed JONES, "I just did that, everything's cool. Got up all our gear and what not" [informing JONES that he (MELENDEZ) met with the Florida member of the organization and received heroin to return to Chicago, Illinois].

209. On September 20, 2002, at approximately 3:06 p.m., KELLY JONES made a call on **Target Phone I** to DANIEL MALDONADO. During this conversation, MALDONADO informed JONES that MELENDEZ was currently delayed in Indiana due to weather conditions. JONES then told MALDONADO that they would need to do "lab" work the next day [preparing the heroin for distribution].

210. On September 20, 2002, at approximately 5:01 p.m., KELLY JONES received a call on **Target Phone I** from RICARDO ARNOLD. During this conversation, JONES informed ARNOLD that he (JONES) was still "waiting" and that his couriers were behind schedule, due to a tornado.

211. On September 20, 2002, at approximately 7:52 p.m., KELLY JONES received a call on **Target Phone I** from MELENDEZ. During this conversation, MELENDEZ informed JONES that he was twenty minutes from JONES' residence.

212. On September 20, 2002, at approximately 8:25 p.m., surveillance observed a white Nissan Altima arrive at 1433 West Warner [residence of KELLY JONES]. Surveillance observed ANGEL MELENDEZ exit the vehicle and carry a black bag into the residence.

**JAMES VALENCIA Travels to Chicago to Meet
With Members of the Organization**

213. On October 16, 2002, at 1:07 p.m., JONES made a call to VALENCIA using Target Phone VIII. VALENCIA told JONES that "I'll be there in a couple days". Also during that conversation, JONES

and VALENCIA discuss getting an "apartment" for VALENCIA. JONES advised VALENCIA that he (JONES) had an apartment because he and his family had just moved to another one, but he maintained the old apartment (1433 Warner, Chicago). VALENCIA also asked JONES for a phone number for others to be able to reach VALENCIA while he was here. JONES told VALENCIA to give out the number for Target Phone VIII, (773) 968-3149. VALENCIA advised JONES that phone would be getting calls from Spanish speaking people, and asked if he should give MORCIGLIO'S phone number. JONES stated "no that, cause that's him Mom's phone". JONES continued to state that "cause any problems I could throw it away", referring to Target Phone VIII.

214. On October 19, 2002, at 11:26 a.m., JONES again made a call to VALENCIA using Target Phone VIII. During that call, VALENCIA advised JONES "maybe I gonna see you this weekend". JONES replied "okay, no problem", and told VALENCIA to call him (JONES) and "let me know".

215. On October 22, 2002, at 4:21 p.m., JONES called VALENCIA using Target Phone VIII. VALENCIA instructed JONES to give two thousand dollars to "MONO" [JUAN LOZADA], so he (LOZADA) could "bring my tickets". JONES stated that he would comply.

216. At 4:22 p.m., on October 22, 2002, JONES called LOZADA from Target Phone VIII. JONES advised LOZADA that he had spoken with "JOTA" (VALENCIA) and was instructed to give him (LOZADA) two thousand for the "tickets". LOZADA then advised JONES

that they could meet later.

217. On October 23, 2002, at 12:54 p.m., JONES called VALENCIA using Target Phone VIII. In the course of this conversation, VALENCIA again told JONES, "maybe see you this weekend, okay".

218. On October 24, 2002, at 8:55 p.m., JONES received a call from VALENCIA on Target Phone VIII. During that conversation, VALENCIA again stated to JONES, "maybe I'll see you Sunday". JONES then asked VALENCIA, "you want me to have anything ready for you"? VALENCIA then stated, "apartment, maybe". JONES replied, "let me know, yeah, I put apartment, I put a bed, everything". During that same conversation, VALENCIA advised JONES that he (JONES) would be going to "see, eh, [Individual G] for [Individual G] it's...but wait for me, okay, don't do it nothing".

219. On October 25, 2002, at 2:29 p.m., JONES put a call into VALENCIA using Target Phone VIII. An unknown male subject answered the phone, and JONES asked for "JAMES". The subject then stated, "no little cousin, no, no, no, he's already traveling". Later in the conversation the subject told JONES that if he (JONES) needed anything to call him at a specified number. This subject continued to tell JONES, "listen, is, is, Dallas if go over there okay". He then stated "I thinking tomorrow is over there, buddy".

220. On October 25, 2002, at 3:29 p.m., JONES received a call from VALENCIA on Target Phone VIII. VALENCIA advised JONES,

"Monday, don't forget Monday, maybe I see you Monday".

221. On October 25, 2002, at 6:00 p.m., LUCHO received a call from LLANOS at (773) 454-5155 on Target Phone X. LLANOS advised LUCHO that VALENCIA had been trying to call him (LUCHO), but had been unable to get through. LLANOS then gave LUCHO the following telephone number and told LUCHO to call VALENCIA, at 011-52-55-11-73-79-22. A check of that number revealed that it was a Mexico City, Mexico telephone number.

222. On October 28, 2002, in the late evening, surveillance agents in Chicago observed VALENCIA, KELLY JONES, LUCHO (JIRON), ROLDAN, WILLIAM MORCIGLIO, and other individuals at a local restaurant in Chicago. Later that same night, these individuals were observed leaving the restaurant.

223. On October 28, 2002, at approximately 8:41 p.m., LUCHO spoke with IRIS TORRES over Target Phone IX and told her to bring the machine that irons [heroin press] to the old apartment [3005 Gunnison, apartment 1E] in the morning.

V. ADDITIONAL INTERCEPTED CALLS/SURVEILLANCE

JAMES VALENCIA aka "Jota" and "Father"

224. On August 20, 2002, at approximately 12:55 p.m., LUCHO received a call on Target Phone IV from an unidentified number. LUCHO spoke with VALENCIA. VALENCIA stated that he had been away and had just returned. VALENCIA asked if LUCHO had sent any of "that" [wire transfer of money]. LUCHO stated that he did.

VALENCIA stated that he missed the wire and asked where LUCHO had sent them [wire transfer]. LUCHO stated "over there, the same place you told me, Cancun". VALENCIA asked LUCHO to see if they [wire remitter] can change it to Caracas, Venezuela. LUCHO asked if he should use the same names. VALENCIA stated that he should. LUCHO stated that he would do that.

225. On August 20, 2002, at approximately 1:58 p.m., LUCHO placed a call from Target Phone IV to VALENCIA. LUCHO told VALENCIA to write down a number [money transfer control number] for the money wire [of drug proceeds]. LUCHO then gave a name [sender's name on wire transfer]. LUCHO continued "he's sending it to . . ." and gave a different name [receiver's name on wire transfer]. LUCHO then provided what is believed to be a money transfer control number. VALENCIA asked where "that one" [wire transfer] was going. LUCHO stated that initially to Cancun but that they were going to change it to "D.F." [Mexico City]. LUCHO stated that he sent "one thousand eight-hundred (1,800)" [quantity of drug money]. VALENCIA stated that he was ready for the other one, "one thousand eight-hundred (1,800)" [quantity of drug money]. LUCHO stated that "Individual H [sender's name on wire transfer] is sending the other one to Individual I [receiver's name on wire transfer]". LUCHO then provided a money transfer control number and stated "the same amount, one thousand eight-hundred (1,800) dollars...to Cancun, but...if you can't claim over there, then I'll

see if, if I can change it to D.F. [Mexico City]".

226. On September 24, 2002, at approximately 9:24 p.m., LUCHO received a call on Target Phone VI from VALENCIA at an unknown telephone number. VALENCIA asks LUCHO "did you 'cook' [wire transfer money] five thousand (5,000) [quantity of money] to that guy...". LUCHO states that he did "cook" five thousand, two hundred (5,200) [quantity of money]. LUCHO states that "Paisita" (MILENA PUPO) gave him "seven (7) pesitos" [quantity of money]. LUCHO says that he paid "Iris" (TORRES) and "Kelly" (JONES), and that three thousand four hundred [quantity of money] was left. VALENCIA tells LUCHO to give him three thousand (3,000) "pesitos" [quantity of money] that he needs in his account "number 310" [bank account].

CARLOS JIRON aka "Lucho" and "Luis"

227. On August 18, 2002, at approximately 1:25 p.m., LUCHO (JIRON) received a call on **Target Phone V** from KELLY JONES using **Target Phone III**. LUCHO told Kelly JONES that he (LUCHO) has a "check for five hundred dollars" for JONES. LUCHO said he would pass by and deliver it to JONES at 5:00 p.m. or 6:00 p.m.

228. On August 18, 2002, at approximately 1:32 p.m., LUCHO placed a call from **Target Phone V** to JONES at **Target Phone III**. LUCHO stated that he was going to the apartment and that he would call JONES when he arrived. JONES asked how long until LUCHO arrived at the apartment. LUCHO stated approximately twenty (20)

minutes.

229. On August 18, 2002, at approximately 2:05 p.m., LUCHO placed a call from **Target Phone V** to JONES at **Target Phone III**. LUCHO asked JONES if he (JONES) was coming. JONES stated that he was almost at the apartment. JONES asked LUCHO to "pass" [deliver] him "five fifteen (515)" [amount of money]. LUCHO agreed to this amount.

230. On August 18, 2002, at approximately 2:28 p.m., LUCHO placed a call from **Target Phone V** to JONES at **Target Phone III**. LUCHO asked if JONES was coming. JONES stated that he was and asked if they were going to meet outside or at the corner. LUCHO stated that he was already outside. JONES stated he would arrive in five (5) minutes.

231. On August 18, 2002, at approximately 2:30 p.m., surveillance units in the area of 1433 W. Warner (residence of JONES) observed JONES enter his vehicle and depart the area. At approximately 2:38 p.m., surveillance units observed a Chrysler Sebring (previously identified as being registered to LUCHO) parked on Sacramento just south of Gunnison Ave. JONES in his Navigator parked immediately behind the Sebring. At approximately 2:40 p.m., JONES drove away in the Navigator and proceeded westbound on Gunnison. LUCHO proceeded westbound on Gunnison.

232. October 2, 2002, at approximately 6:06 P.M., LUCHO placed a call from **Target Phone VI** to VALENCIA. LUCHO stated that he

talked to "the Singer" [New York Supplier] and that New York Supplier would be calling LUCHO to let him know if Individual J [drug courier] was coming to Chicago.

233. On October 3, 2002, at approximately 9:58 A.M., LUCHO placed a call from **Target Phone VI** to VALENCIA. LUCHO stated that there is "fourteen five hundred (14500)" [quantity of money] to give to Individual J.

234. On October 3, 2002, at approximately 1:19 P.M., LUCHO placed a call from **Target Phone VI** to Individual J at (347) 256-4642. Individual J stated that he would arrive in approximately one hour. During the same time period, surveillance units in the area of the Greyhound Bus terminal observed LUCHO exit his vehicle and walk to the bus terminal where he waited for some time. While waiting, LUCHO was observed utilizing his cellular phone. At approximately 3:50 P.M., Greyhound Bus #6347 arrived at the bus terminal on Harrison Avenue. DEA Transportation agents approached the off-loading area for bus. The first passenger to exit the bus was carrying a small black overnight-size bag. This individual was believed to be Individual J. After departing the arrival area, Individual J was approached by LUCHO. They both exited the bus terminal together and walked to LUCHO's car on Des Plaines Avenue. Surveillance units subsequently followed LUCHO and Individual J to 3005 W. Gunnison.

235. On October 17, 2002, at approximately 10:30 p.m., KELLY

JONES received a call from JAMES VALENCIA on **Target Phone VIII**. During that conversation, VALENCIA instructed JONES to "pass to" LUCHO (JIRON) later that night. JONES advised VALENCIA that he (JONES) had been calling LUCHO, but LUCHO was not answering. VALENCIA then gave JONES the following telephone number: 501-1695 (**Target Phone X**). JONES then stated that he would call LUCHO "right now".

236. On October 17, 2002, at approximately 10:31 p.m., KELLY JONES using **Target Phone VIII** called **Target Phone X** and spoke with LUCHO. During that conversation, LUCHO asked JONES if he (JONES) had "four hundred" [quantity of heroin]. JONES advised LUCHO that he had "three twenty or three twenty-five" [quantity of heroin]. LUCHO then told JONES that he (LUCHO) was at "MARTICA's" (LLANOS). JONES stated that he (JONES) would meet LUCHO there. Affiant believes that based on this conversation, JONES and LUCHO were planning to meet in order for JONES to deliver a quantity of heroin to LUCHO.

237. However, rather than meeting at LLANOS' place, based on subsequent intercepted conversations Affiant believes that JONES and WILLIAM MORCIGLIO agreed to meet with LUCHO at a different location to deliver LUCHO the heroin. Specifically, on October 17, 2002, at approximately 11:09 p.m., **Target Phone VIII** contacted **Target Phone X**. During that call, WILLIAM MORCIGLIO spoke with LUCHO, and KELLY JONES is heard in the background next to

MORCIGLIO. MORCIGLIO and LUCHO discussed meeting each other in the area of the streets of Wilson and California, by the "train".

238. On October 17, 2002, at approximately 11:20 p.m., WILLIAM MORCIGLIO using **Target Phone VIII** called LUCHO on **Target Phone X**. MORCIGLIO explained to LUCHO how to get to the meeting area. LUCHO asked MORCIGLIO which car he (MORCIGLIO) was in, and MORCIGLIO responded that he was in a green Pontiac Bonneville. LUCHO stated that he was in the "blue one", and he has his lights on.

239. On October 17, 2002, at approximately 11:23 p.m., WILLIAM MORCIGLIO using **Target Phone VIII** called LUCHO on **Target Phone X**. LUCHO advised that he was at a gas station at Lawrence and California. MORCIGLIO then gave LUCHO directions from that location to the meet location, at Wilson and California.

240. On October 22, 2002, at approximately 12:17 P.M., JONES placed a call from **Target Phone VIII** to LUCHO at (773) 501-1695. LUCHO asked if he and JONES were going to meet. JONES agreed to meet. JIRON stated they would meet "in the old apartment, the one on Lawrence".

241. On October 22, 2002, at approximately 1:18 P.M., JONES placed a call from **Target Phone VIII** to LUCHO at (773) 501-1695. LUCHO stated that he was on Lincoln and Western and that he was going over "there" [3005 W. Gunnison]. JONES stated that he would arrive in five minutes. LUCHO stated that when JONES arrives he should go upstairs and a "friend" of LUCHO's would give him

(JONES) the "money".

242. At approximately 12:30 P.M., surveillance units in the area of 3005 W. Gunnison advised that LUCHO's vehicle was parked on Sacramento just North of W. Gunnison. At approximately 1:00 P.M., LUCHO accompanied by an unidentified male departed the vicinity of 3005 W. Gunnison in the LUCHO's vehicle. LUCHO drove in circles around the streets within one or two blocks going North then West and then back East to Gunnison. At approximately 1:15 P.M., LUCHO returned to the 3005 W. Gunnison address with the unidentified male passenger. At approximately 1:30 P.M., surveillance units observed JONES' Navigator arrive and park on Sacramento at Gunnison. Surveillance units observed JONES exit the Black Navigator and walk to the 3005 W. Gunnison address and enter the building. At approximately 1:35 P.M., JONES returned to the Black Navigator and departed the area of W. Gunnison.

DAVID ACEVEDO

243. On August 3, 2002, at approximately 12:06 p.m., KELLY JONES using **Target Phone I** called DAVID ACEVEDO at telephone number (773) 206-0694. During this conversation, JONES told ACEVEDO that he (JONES) had "to finish a little lab work" [drug-related work] that he had "at the crib" [at his residence]. ACEVEDO asked JONES if he needed anything [supplies for drug-related work] and JONES replied that he thought he had everything and that he had the "gloves from last time" [used to package the heroin]. JONES stated

that he was going to look for another blender because the one he had now was jamming on him and ACEVEDO stated "again". JONES then stated that it [heroin] was not that much, that it [heroin] was already mixed, "like a couple of hundred just gotta be crushed a little bit better" and that it will be all ready to go. ACEVEDO then stated alright and agreed to meet JONES at his residence to help with the work [drug-related activity].

William Anthony Morciglio aka "Woody"

244. On October 21, 2002, JONES received a call from VALENCIA where VALENCIA stated that he had "work" in Galveston (Texas). VALENCIA provided a Houston, Texas area cellular phone number to JONES as a contact number for this "work". VALENCIA told JONES to "put it in a radio" [boom-box type radio]. JONES stated that he would take care of it. JONES later contacted Yolanda RIVERA and stated that "it's about that time" and asked RIVERA if she was "down". RIVERA agreed to travel for JONES.

245. On or about October 21, 2002, MORCIGLIO and RIVERA departed Chicago for Galveston, Texas. Several calls were intercepted between JONES and MORCIGLIO during which MORCIGLIO reported their (MORCIGLIO and RIVERA) progress. According to intercepted calls, MORCIGLIO and RIVERA arrived in Galveston, Texas on October 23, 2002. MORCIGLIO and RIVERA later traveled to "H-town" (Houston, Texas) in order to meet an unidentified individual for the purpose of picking up a quantity of heroin. According to

intercepted calls, MORCIGLIO and RIVERA departed Houston, Texas for Chicago on October 23, 2002.

246. On October 24, 2002, surveillance units observed MORCIGLIO and RIVERA arrive in JONES' Nissan Altima at 18215 S. Kedzie, the residence of RIVERA. At that point, RIVERA exited the Altima. Shortly thereafter, surveillance units in the area of 1433 W. Warner observed MORCIGLIO arrive in the Altima. MORCIGLIO and JONES later appeared to meet in the rear alley of 1433 W. Warner.

MARCUS JONES aka "Titty" and "T"

247. On August 3, 2002, at approximately 4:32 p.m., WILLIAM MORCIGLIO called KELLY JONES on **Target Phone I**. During this conversation, MORCIGLIO told JONES that his dad [VALENCIA] had been trying to contact him (JONES) all day. JONES told MORCIGLIO that he was working [drug-related activity], and that he would call VALENCIA when he (JONES) was finished because he (JONES) did not have "this shit" [heroin] ready and he had to get rid of it [heroin]. MORCIGLIO also told JONES that VALENCIA wanted JONES to call LUCHO because he (LUCHO) "needs to go shopping" [purchase heroin] and wants to know if he needs to send his nephew "out there" [possibly referring to drug-related trip to New York] tomorrow. JONES told MORCIGLIO that he would call him (VALENCIA) in a little bit because he (JONES) was doing the "lab work" [drug-related activity] with "Dave" [ACEVEDO], "Danny" [MALDONADO] and "T" [MARCUS JONES].

IRIS D. TORRES

248. On September 29, 2002, at approximately 7:29 a.m., LUCHO received a call on **Target Phone VI** from (954) 554-7647. During this conversation, LUCHO spoke with Individual K who gave LUCHO the address and directions to a Holiday Inn Hotel where he (Individual K) was staying. Individual K asked if the "clothes" [heroin] are "ironed" [ready for distribution] or if the "lady" [IRIS TORRES] "irons" them. LUCHO responded that the "lady" [IRIS TORRES] irons "them" [heroin].

249. On September 29, 2002, at approximately 7:31 A.M., JIRON (LUCHO) placed a call from **Target Phone VI** to TORRES at (773) 637-8271. LUCHO stated that he talked with the "guy" (Individual K). LUCHO then provided TORRES with Individual K's telephone number, (954) 554-7647. LUCHO stated that "he" was waiting at a hotel at 5300 Touhy and that he didn't know if it was the same hotel as "last time". TORRES stated that she was going to call "him" (Individual K) later.

250. At approximately 10:47 A.M., surveillance agents in the area of the Holiday Inn located at 5300 W. Touhy, Skokie, Illinois observed an unidentified Hispanic Male exit the hotel wearing a blue hooded sweatshirt and utilizing a cellular telephone. This individual met with a Blue Toyota SUV, bearing Illinois license plate number C11964 (registered to Individual E). Individual K returned to the hotel and the Blue Toyota pulled away.

Surveillance team members observed IRIS TORRES in the front seat of the vehicle with an unidentified Hispanic Male.

251. On September 29, 2002, at approximately 10:51 A.M., LUCHO received a call on **Target Phone VI** from Individual K at (954) 554-7647. Individual K stated "it's come, it's here already" [the delivery had been made]. Individual K asked LUCHO if it was "the mother and daughter". LUCHO stated that it was. Individual K continued that he "already gave them . . ." [delivered the heroin quantity]. LUCHO then stated "ok, the little clothes" [heroin quantity].

252. On September 29, 2002, at approximately 11:39 a.m., LUCHO received a call on Target Phone VII from an unidentified number, and spoke with JAMES VALENCIA. During this conversation, LUCHO told VALENCIA that "the guy is here" [a courier arrived in Chicago] and that LUCHO was talking to him now. LUCHO further told VALENCIA that he was making arrangements for a "box" [secret compartment] to be made for his car.

253. On September 30, 2002, at approximately 8:59 a.m., LUCHO received a call on Target Phone VII from an unidentified number, and spoke with JAMES VALENCIA. During this conversation, VALENCIA asked how things went the day before. LUCHO stated that everything went fine and that he and "IRIS" [TORRES] already delivered it [delivery of heroin]. VALENCIA told LUCHO to "save" [hold onto the heroin] for "NEGRA" [SANDRA VELAZQUEZ] and "MONO" [JUAN LOZADA].

254. On October 4, 2002, at approximately 1:05 P.M., LUCHO placed a call from **Target Phone VI** and spoke with VALENCIA. LUCHO stated that he spoke with "Iris" [TORRES] and that they (LUCHO and TORRES) were going to the "shop" [heroin lab] to look at the "fabrics" [heroin quantity]. LUCHO stated that TORRES was upset because she spoke with someone who told TORRES that she should be being paid more than "300 pesos" [quantity of money]. LUCHO continued that TORRES now wants "us" [VALENCIA and LUCHO] to pay her "1,000 pesos" [quantity of money]. VALENCIA told LUCHO to tell TORRES that "the time is different" and "It's not the same as when she did it with the other guy. When she did it with my friend, it was more".

255. On October 4, 2002, at approximately 7:02 P.M., LUCHO placed a call from **Target Phone VI** and spoke with VALENCIA. LUCHO told VALENCIA "up until right now, there's one(1) one(1) three(3) eight(8) and we're picking up the . . . crumbs to see what it comes to . . ." [LUCHO and TORRES are processing heroin and LUCHO is giving the weight to VALENCIA]. LUCHO stated "that threw Iris on the bed" [TORRES became ill from processing] and that "it's very good. It's very good." [high quality heroin].

256. On October 4, 2002, at approximately 7:21 P.M., LUCHO placed a call from **Target Phone VI** and spoke with VALENCIA. LUCHO told VALENCIA "one(1) one(1) four(4) five(5)" [heroin quantity]. VALENCIA told LUCHO to "price it at 150, you say it's great, right"

[price related to the high quality of the heroin]. LUCHO stated "we're going to iron this now" [LUCHO and TORRES and going to process heroin quantity]. At that point TORRES began to speak with VALENCIA. TORRES told VALENCIA that she was "a little out of it" [ill from processing heroin] and that "we were well covered . . . but this shit is an atomic bomb" [LUCHO and TORRES wore protective attire but the heroin is of very high quality]. TORRES asked VALENCIA how much he (VALENCIA) told "Lucho" to give her (TORRES) for "the pick-up" [TORRES picking up heroin quantity from a courier]. VALENCIA stated that he told LUCHO to give her "300" [quantity of money]. TORRES stated "to go that far for 300, no way". VALENCIA told TORRES "the job is his [JIRON] so you guys have to divide it between you". TORRES told VALENCIA to tell LUCHO because she already told him (LUCHO) "if not I wouldn't go pick up anymore". [TORRES would not pick up heroin unless she gets more money].

MARTHA LLANOS aka "Martica", "La Mona", and "Pie Malo"

257. On August 13, 2002, at approximately 8:54 a.m., LUCHO placed a call from **Target Phone IV** to (773) 562-7316 and spoke with a female LUCHO referred to as "Martica" [Martha LLANOS]. LUCHO stated that he brought back world cup "T-shirts" [heroin] from Miami and that he had "ten, eight, seven" [heroin quantities]. LUCHO also stated that maybe LLANOS wanted to take the number ten, "the captain's shirt, the large size" [heroin quantity]. LLANOS

responded that she would need "half" [heroin quantity] for the following day. LUCHO then stated, "Oh, alright, number five then". LUCHO added that the T-shirts were "very pretty" [high quality heroin]. LUCHO and LLANOS agreed to talk later in the day.

258. On August 13, 2002, at approximately 4:31 p.m., LUCHO received a call on **Target Phone IV** from (773) 562-7316 and spoke with LLANOS. LLANOS stated that she needed LUCHO to lend her 100 "pesitos" [heroin or money quantity]. LLANOS asked if LUCHO could deliver "them" [heroin or money] to the girl that works with her. LLANOS provided the address of the girl as 2952 "west of the same street". LUCHO stated that he knew where this address was. LUCHO stated that he could deliver the heroin or money in approximately thirty minutes.

259. On August 13, 2002, at approximately 4:09 P.M., surveillance units in the area of 3005 W. Gunnison, the residence of LUCHO. Surveillance units observed the Hispanic male driver (who matched the known physical description of LUCHO), exit the vehicle and enter the courtyard area of 3005 W. Gunnison. LUCHO had a small bag thrown over his shoulder.

260. On August 13, 2002, at approximately 5:00 p.m., surveillance units observed LUCHO exit the immediate area of his residence and enter a vehicle. Surveillance units observed LUCHO retrieve a small silver plastic bag from the trunk area and place it in the passenger area of this vehicle. LUCHO departed the area

followed by surveillance units. At approximately 5:14 p.m., surveillance units observed LUCHO pull over in the area of 2952 W. Montrose. LUCHO exited the vehicle with the same small bag as observed earlier near his residence. Surveillance units observed LUCHO enter "La Kayana" located at 2952 W. Montrose, which is the wire remitter business owned/operated by Martha LLANOS. At approximately 5:17 P.M., surveillance units observed LUCHO exit La Kayana. Surveillance units observed LUCHO enter his vehicle and move the vehicle several feet on Montrose. LUCHO exited the vehicle and re-entered La Kayana. At approximately 5:22 P.M., surveillance units observed LUCHO re-enter the Sebring and depart the area.

261. On August 14, 2002, at approximately 10:49 a.m., LUCHO placed a call on **Target Phone IV** to JAMES VALENCIA. During this conversation, LUCHO stated that he gave "one hundred (100)" [heroin or money quantity] to "Pie Malo" (LLANOS).

262. On August 19, 2002, at approximately 8:23 p.m., LUCHO placed a call from **Target Phone IV** to "Martica" (Martha LLANOS) at (773) 562-7316. During this conversation, LUCHO asked if LLANOS was going to be at her house. LLANOS stated that she would be home soon. LUCHO stated that he had some "receipts" [amount of money] for her. LLANOS stated that she would be home at 9:00 p.m.

263. On August 19, 2002, at approximately 9:03 p.m., surveillance units observed the Chrysler Sebring registered to

LUCHO travel south on St. Louis and park in front of 4522 N. St Louis, the residence of Martha LLANOS.

264. On August 19, 2002, at approximately 9:08 p.m., LUCHO placed a call from **Target Phone IV** to "Martica" (Martha LLANOS) at (773) 562-7316. LUCHO asked if LLANOS was home yet and stated that he was outside. LLANOS stated that she would be there in five (5) minutes. Surveillance units observed LUCHO walk up the front staircase of the residence at 4522 N. St. Louis while carrying a small box. LUCHO knocked on the front window and then entered the front door with the box in hand. At approximately 9:12 p.m., surveillance units observed LUCHO exit the residence with two unidentified Hispanic males. The three individuals entered the Chrysler and departed the area.

265. On August 20, 2002, at approximately 12:55 p.m., LUCHO received a call on **Target Phone IV** from JAMES VALENCIA. During this telephone call, LUCHO stated that he gave "Pie Malo" (LLANOS) "twenty (20)" [quantity of money].

266. On September 1, 2002, at approximately 7:02 p.m., LUCHO using **Target Phone VI** called KELLY JONES on **Target Phone III**. LUCHO stated that "MARTICA" (MARTHA LLANOS) needed "four CD's" [heroin or money quantity]. LUCHO asked how many CD's [heroin or money quantity] JONES had, and stated that "MARTICA" needed at least "one big one" [heroin or money quantity] that day, and further stated that JONES should call "MARTICA" (LLANOS). JONES

stated that he had "nine hundred" [heroin or money quantity].

267. On September 17, 2002, at approximately 4:36 P.M., surveillance units in the area of 2952 West Montrose observed JONES arrive in the area. Surveillance units observed JONES walk into La Kayana carrying a white plastic bag. It appeared the bag was a grocery bag with something inside. At approximately 4:37 P.M., JONES left La Kayana store with the same plastic bag. It appeared the bag contained an object. JONES then left the area and drove east through an ally.

268. On September 22, 2002, at approximately 10:16 p.m., LUCHO placed a call from **Target Phone VII** to **Target Phone VIII**. LUCHO told KELLY JONES that "Monito" [JUAN LOZADA] wanted to see him (JONES) and asked JONES to call "Monito". JONES then asked if LUCHO wanted anything. LUCHO stated that he needed some "for 'Martica' [MARTHA LLANOS], who needs a whole CD [heroin quantity]". JONES stated that he has "some" [heroin quantity] and that he could stop by if LUCHO wants. JONES then stated that he has 1,300 [heroin quantity]. LUCHO stated that he wants "only 1,000 [heroin quantity] for 'Martica' [LLANOS] and 300 [heroin quantity] for 'Mono'" [JUAN LOZADA]. JONES agreed to drop off for LUCHO the following day at approximately 10:30 a.m.

269. On October 16, 2002, at approximately 1:07 p.m., KELLY JONES using **Target Phone VIII** made a call to JAMES VALENCIA. During this conversation, VALENCIA and JONES discussed which

cellular telephone number VALENCIA should give out, in order for others to contact VALENCIA when he comes to Chicago, Illinois. JONES advised VALENCIA to give out "this one" (**Target Phone VIII**). JONES further stated that "yeah, cause any problems I could throw it away". VALENCIA also stated to JONES, "maybe we'll, we'll have apartment over there". JONES advised VALENCIA that he had an apartment and VALENCIA instructed JONES to "save, save for me". VALENCIA told JONES to call New York Supplier in New York. VALENCIA then stated that he (VALENCIA) would "be there in couple days for the job". VALENCIA then asked JONES about the quality of the heroin that JONES had taken delivery of recently. JONES stated that "this one is solid like that but it's changing". JONES further stated, "it's changing into powder, you know what I'm saying"? JONES advised VALENCIA that he (JONES) "gave to, to MARTICA [LLANOS], yeah five and then I, I have the rest, the three seventy at home plus the fifty from before". VALENCIA told JONES to give Individual D the "new one, not the old one."

VIBENCIO CONSUEGRA

270. On June 15, 2002, at approximately 2:42 p.m., VALENCIA called KELLY JONES on **Target Phone I**. During this conversation, JONES advised VALENCIA that he took care of CONSUEGRA with 200 [quantity of heroin] and that LUCHO wanted 300 [quantity of heroin], one [heroin quantity] for NEGRA [VELAZQUEZ] and two [heroin quantity] for PIASA [MILENA PUPO].

271. On June 23, 2002, at approximately 1:47 p.m., VALENCIA called KELLY JONES on **Target Phone II**. During this conversation, VALENCIA instructed JONES to ask LUCHO to deliver "600" [heroin quantity] for CONSUEGRA.

272. On June 23, 2002, at approximately 1:50 p.m., KELLY JONES called CONSUEGRA on **Target Phone II**. During this conversation, JONES informed CONSUEGRA that LUCHO has "600" [heroin quantity] for him.

273. On June 27, 2002, at approximately 12:36 p.m., CONSUEGRA called KELLY JONES on **Target Phone II**. CONSUEGRA asked JONES if he had a "CD" [heroin quantity] and JONES stated no. CONSUEGRA then told JONES to "go to LUCHO, I need, the big man [CONSUEGRA's big/primary customer] is ready". CONSUEGRA told JONES to call "J" [VALENCIA] or LUCHO because he (CONSUEGRA) needed 1,000 [heroin quantity]. JONES stated that he would call everybody right now and then he would call CONSUEGRA back.

274. On July 8, 2002, at approximately 12:42 p.m., KELLY JONES using **Target Phone II** called VALENCIA. JONES told VALENCIA that he gave CONSUEGRA "9" [heroin quantity] and gave LUCHO the rest [heroin quantity]. VALENCIA stated "yes, give to LUCHO, please".

275. On August 5, 2002, at approximately 1:52 p.m., VALENCIA called KELLY JONES on **Target Phone III**. During this conversation, JONES told VALENCIA that LUCHO had given CONSUEGRA something and that his (CONSUEGRA's) friend had returned 500 [quantity of heroin]

to him (CONSUEGRA). VALENCIA told JONES that LUCHO was going to take a vacation for two weeks, and JONES stated that he was ready for anything, and that he had the stuff [heroin quantity] ready at home. VALENCIA told JONES that LUCHO was going to take care of LA NEGRA [VELAZQUEZ] today and that he (LUCHO) was going to "bring something" [heroin quantity] for JONES to take to Individual G. JONES also advised VALENCIA that he needed "something to do" [drug-related activity]. VALENCIA asked JONES if Individual D had brought him "money" and JONES replied that the store was closed and the number was disconnected. JONES told VALENCIA that he (JONES) had spoken with Individual D on Wednesday and that Individual D told him (JONES) that he would pay him tomorrow but that he (JONES) went to the store and it was closed. JONES also asked VALENCIA if he needed someone to go anywhere and VALENCIA stated "no, I need money" and instructed JONES to go see Individual G to see if he had money.

276. On August 15, 2002, at approximately 5:16 p.m., LUCHO received a call on **Target Phone V** from (773) 510-0537. This telephone is subscribed to and utilized by Vibencio D. CONSUEGRA aka "CONSUEGRO". During this conversation, CONSUEGRA stated that he needed "three" [heroin quantity].

277. On August 15, 2002, at approximately 8:36 p.m., LUCHO placed a call on **Target Phone V** to CONSUEGRA at (773) 510-0537. During this conversation, LUCHO and CONSUEGRA agreed to meet at the

gas station at the intersection of Central Park and Diversey Avenue. LUCHO stated that he had "four" [heroin quantity]. CONSUEGRA asked how much and LUCHO answered "four hundred" [heroin quantity]. CONSUEGRA then asked if LUCHO had a "whole one" [heroin quantity]. LUCHO replied that he did have a "whole one" [heroin quantity]. LUCHO and CONSUEGRA agreed to meet approximately thirty minutes later.

278. On August 15, 2002, at approximately 8:55 p.m., surveillance units observed LUCHO arrive by vehicle at the gas station located at the intersection of Central Park Avenue and Diversey Avenue. At approximately 9:01 p.m., LUCHO left the gas station and traveled east on Diversey. At approximately 9:02 p.m., surveillance units observed CONSUEGRA arrive by vehicle at the gas station and meet with LUCHO. CONSUEGRA was observed standing at the passenger side door of LUCHO's vehicle. Surveillance units observed a hand-to-hand transaction between LUCHO and CONSUEGRA. CONSUEGRA placed an object in his back pocket and walked back to his vehicle. LUCHO then left the parking lot and drove east on Diversey Avenue. At approximately 9:06 p.m., CONSUEGRA returned to his vehicle and began looking around the street. At approximately 9:07 p.m., surveillance units observed LUCHO walking west on Diversey Avenue. LUCHO was carrying what appeared to be a plastic grocery bag with an item inside. LUCHO walked to CONSUEGRA's vehicle. Surveillance units then observed LUCHO

walking east on Diversey Avenue without the plastic bag.

279. On August 16, 2002, at approximately 3:01 p.m., LUCHO placed a call on **Target Phone IV** to CONSUEGRA at (773) 510-0537. During this conversation, CONSUEGRA told LUCHO that the CD's [heroin quantity] were incomplete by "five (5)" [heroin quantity]. LUCHO then asked "fifty (50)?" [heroin quantity]. CONSUEGRA answered "No, five (5)" [heroin quantity]. LUCHO asked how much the total was to which CONSUEGRA responded "nine nine five (995)" [heroin quantity]. LUCHO then stated that if CONSUEGRA needed more CD's, he (LUCHO) had some.

280. On August 16, 2002, at approximately 5:32 p.m., LUCHO placed a call on **Target Phone IV** to VALENCIA. During this conversation, VALENCIA asked if LUCHO gave CONSUEGRA "two hundred (200)" [heroin quantity]. LUCHO stated that he gave CONSUEGRA "a complete one (1)" [heroin quantity]. LUCHO added it was "a thousand (1,000) pesitos" [heroin quantity].

281. On September 12, 2002, at approximately 4:36 p.m., LUCHO received a call from VIBENCIO CONSUEGRA. LUCHO stated that he wasn't ready yet, and that he was EL Llano restaurant. LUCHO and CONSUEGRA agreed to meet at El Llano restaurant on Lincoln Avenue.

282. On September 12, 2002, at approximately 6:06 p.m., surveillance agents in the area of El Llano restaurant observed LUCHO and CONSUEGRA exit the restaurant and walk south on Lincoln. CONSUEGRA and LUCHO stopped at a black Oldsmobile Bravada.

CONSUEGRA appeared to be placing an object inside the vehicle through the passenger door. CONSUEGRA then entered the vehicle.

283. On September 12, 2002 at approximately 6:26 p.m., LUCHO using **Target Phone VI** called VALENCIA and stated "I picked sixty [money quantity] up for you from 'Consu' [CONSUEGRA]". VALENCIA told LUCHO to put "50" [quantity of money] aside for "Mono" and to take the "rest" [quantity of money] to "Nano" [Cosme CHACON].

284. At approximately 6:30 p.m., surveillance observed CONSUEGRA parked across from the residence at 1921 Monticello in Chicago, Illinois. Agents observed CONSUEGRA enter the residence at 1921 Monticello carrying a white plastic bag and a small black bag.

285. On October 16, 2002, at approximately 8:00 p.m., KELLY JONES received a call on **Target Phone I** from JAMES VALENCIA. VALENCIA advised JONES to "bring two hundred [quantity of heroin] to, to CONSUEGRA, please, right now". JONES stated that he would.

286. On October 17, 2002, at approximately 11:44 a.m., KELLY JONES received a call on **Target Phone VIII** from JAMES VALENCIA. VALENCIA asked JONES if he (JONES) had called CONSUEGRA the night before. JONES advised VALENCIA that CONSUEGRA was "bitching and talking shit on the phone". VALENCIA then told JONES "don't bring him nothing [heroin]". JONES further advised VALENCIA that he (JONES) had "passed" one hundred [quantity of heroin] to Individual D.

Shantell Hill

287. During the wire interception investigation, SHANTELL HILL was intercepted on numerous occasions - on average approximately twice a week - in which HILL discussed with JONES the purchase of heroin by HILL from JONES. On various occasions, HILL mentions needing to obtain heroin ^{for C.D.} from his customer. During a meeting between THOMAS and law enforcement, THOMAS identified a photograph of SHANTELL HILL. According to THOMAS, "SHANTELL" is a black, male who purchases heroin from KELLY JONES and has done so since approximately March 2001. On May 9, 2002, agents/officers met with THOMAS. During this meeting, THOMAS stated that on April 30, 2002, he was in the vehicle of KELLY JONES and he (JONES) met a male driving a motorcycle, on Narragansett, North of Diversey, in Chicago. JONES parked his Navigator and approached the male and gave him a bag. THOMAS did not see what was in the bag, but believed it could have contained heroin, based on THOMAS's prior experience with the organization. JONES then met SHANTELL HILL in the same area, on Narragansett. JONES asked THOMAS to approach the vehicle of HILL and obtain money from him. THOMAS received a quantity of currency from HILL, that HILL reported to be \$2,705.00. THOMAS gave the currency to JONES. THOMAS stated that he believed this money was payment for heroin, since HILL at one time used to be a heroin customer of THOMAS. G5B

288. On August 19, 2002, at 8:18 p.m., JONES received a call

from Shantell HILL at (630) 670-2532 on Target Phone I. During that conversation, HILL asked JONES "what was my tab, yo, about nineteen"? [drug debt]. JONES responded "yeah". HILL then stated, "yeah, they all...I think I'm at about eighteen and a half". JONES then said "all right".

a. On September 9, 2002, at approximately 7:30 p.m., JONES received a call on Target Phone I from SHANTELL HILL. HILL discussed with JONES how much money HILL owed JONES in drug debts.

b. On September 16, 2002, at approximately 6:32 p.m., JONES received a call on Target Phone I from SHANTELL HILL. During that call, JONES asked HILL how much HILL owed JONES [drug debt], and HILL replied "thirteen-forty" [\$1,340 in drug debt]. HILL later asked JONES for "10" [heroin quantity].

289. On September 24, 2002, at 6:17 p.m., JONES made a call to HILL at (630) 750-6571 on Target Phone I. During that conversation, HILL advised JONES that he (HILL) needed "a twelve piece". JONES and HILL then agree to meet between 7:30-8:00 p.m. Surveillance team members followed HILL to 5406 W. Congress Parkway. HILL was observed by surveillance entering the residence at approximately 7:45 p.m. HILL returned to his vehicle at approximately 8:14 p.m.

290. At 8:20 p.m., on September 24, 2002, JONES again called HILL on Target Phone I. JONES and HILL agree to meet in the area of Central Avenue and Washington Street, Chicago, in "ten minutes".

291. At approximately 8:27pm HILL traveled to Shell Gas Station at Austin and Harrison in Chicago, Illinois. HILL parked next to JONES at a gas pump. JONES was driving his black Lincoln Navigator. HILL and JONES met by the driver door of the Navigator. HILL left the area at approximately 8:29pm. Surveillance team members followed HILL to the area of Fillmore and Harlem. In the area of 7720 West Fillmore in Forest Park, officers conducted a traffic stop at approximately 8:35 p.m. During a search of the Chrysler van by the officers, approximately 13 grams of heroin were recovered under some papers between the front seats. HILL turned over approximately 3 grams of cannabis from his shoe to Officer Watkins.

292. On September 26, 2002, at 6:49 p.m., JONES received a call from HILL at (630) 750-6571 on Target Phone I. During that call, HILL stated to JONES, "when I left you that Tuesday night", "I got hit". JONES asked HILL what happened. HILL stated that "motherfuckers stuck me up". JONES asked "who"? HILL continued to describe that he thought that he was set up and that it was not really the police who stopped him. HILL continued to state that he did not see any badges, bullets or radios and that the vehicle the men were driving did not have "green plates". JONES asked HILL why he did not call JONES to tell him, HILL stated that he was "puzzled" about what had happened. HILL also told JONES that the men took "the twelve piece, and they was out".

RICARDO ARNOLD aka "Ricky" and "Chino"

293. On June 22, 2002, surveillance was directed to the area of Irving Park Road and Western Avenue. Information was intercepted on the wire tap that Kelly JONES was meeting a subject at the Amoco Gas station located at that intersection to deliver heroin to the subject, "CHINO" (RICARDO ARNOLD). The surveillance team observed JONES arrive in his black, Lincoln Navigator. The surveillance identified three other individuals in the Navigator with JONES. These subjects were identified as Marcus JONES, seated in the front passenger seat, and two juveniles seated in the rear seat (Kelly JONES' two children). Agents and officers observed JONES exit the Navigator and stand just outside the open front door. JONES was then seen, motioning as if he was putting something in his front pants pocket. JONES then walked to the other side of the gas station, where the view was obstructed, but surveillance was able to see JONES meet with a male, black subject wearing an orange shirt. The two subjects walked to a car parked in the corner of the lot, the hood on the vehicle was up. JONES was seen conversing with the subject and walk around the vehicle, at one point out of the sight of the surveillance team to the trunk of the vehicle. One agent was able to position himself to have a view of the vehicle, and it was reported that the vehicle was a silver/blue, Chevrolet, Lumina with Illinois registration 2267903. This vehicle is registered to ARNOLD.

294. On September 1, 2002, at approximately 10:10 a.m., KELLY JONES made a call on Target Phone III to RICARDO ARNOLD. During this conversation, ARNOLD informed JONES that "I need twenty two right now" [quantity of drugs]. JONES agreed and asked ARNOLD if he wanted to "come grab it". ARNOLD agreed. JONES instructed ARNOLD to "come over" and "come through the back". ARNOLD agreed.

295. On September 29, 2002, at approximately 10:48 p.m., KELLY JONES received a telephone call on Target Phone I from RICARDO ARNOLD. During this conversation, ARNOLD stated that his "man" [drug customer] wanted "twenty-five" [quantity of heroin] tonight and "fifty" [quantity of heroin] the following day. JONES informed ARNOLD that he (JONES) only had "thirty" or "forty" [quantity of heroin]. JONES advised ARNOLD that he should meet him (JONES) later on that night and could pay him (JONES) the following day [pay JONES for the heroin].

296. On September 30, 2002, at approximately 2:16 p.m., KELLY JONES received a telephone call on Target Phone I from RICARDO ARNOLD. During this conversation, ARNOLD informed JONES that he (ARNOLD) needed "ten more" [quantity of heroin]. JONES suggested they meet sometime between 3:00 p.m. and 4:00 p.m., and ARNOLD agreed. JONES stated that he (JONES) would travel to ARNOLD's residence.

297. On October 16, 2002, at approximately 1:00 p.m., KELLY JONES received a call on Target Phone I from "CHINO" (RICARDO

ARNOLD) at (773) 491-1352. During that conversation, JONES asked ARNOLD, "what's up with your boy" [ARNOLD's drug customer]? JONES further stated that he had "200" [quantity of heroin] and wanted to see if ARNOLD wanted to "work" with it [distribute the heroin]. ARNOLD advised JONES that he (ARNOLD) was interested and would call JONES back later.

298. On August 24, 2002, at approximately 1:22 P.M., JONES received a call on Target Phone III from ARNOLD at (773) 617-9272. During this conversation, ARNOLD ("Chino") stated that he had to "shoot at some niggers that were trying to roll on him".

299. On August 30, 2002, at approximately 3:29 P.M., JONES received a call on **Target Phone I** from ACEVEDO at (773) 206-0694. During this conversation JONES and ACEVEDO talk about an unidentified individual who sells rims for tires. JONES states that at approximately two o'clock he [unidentified individual] should be getting off work. JONES then states "I got to go see him anyway, 'cause his boy is getting me a strap [gun]". JONES continued "yeah, for two fifty (250) [quantity of money] a three eighty (380) [.380 caliber gun]". ACEVEDO then asked about the "Glock" [type of handgun]. JONES responded that the "dude" already sold it. JONES then stated that he should "grab this [.380] for now and then grab a Glock later".

300. On October 21, 2002, at approximately 2:41 P.M., JONES received a call on **Target Phone I** from ARNOLD at (773) 491-1352.

JONES made reference to an unidentified individual and said that he "got some straps" [guns]. JONES continued that he (unidentified individual) had a couple little things "like a thirty-eight (38) or a three eighty (380) and a twenty-two (22)" [different caliber guns]. JONES later stated that he (unidentified individual) wants "380" [quantity of money] for both guns or "a bill" [\$100] for the .22 caliber gun alone. JONES stated that he was going to "check them out" and told ARNOLD "you never know". ARNOLD then stated that he had a "hook up" on a "Desert Eagle" [type of handgun] but that the individual selling it wanted seven hundred dollars for it.

MIGUEL SANCHEZ aka "Mikey"

301. On August 5, 2002, at approximately 2:08 p.m., KELLY JONES using **Target Phone I** called "MIKEY" at telephone number (773) 680-9781. During this conversation, MIKEY told JONES that he would probably "go pick up that other shit [heroin quantity] up from you today" and advised JONES to give him (MIKEY) a call whenever he (JONES) was ready, and JONES concurred.

302. On August 14, 2002, at 2:00 p.m., JONES received a call from SANCHEZ at (773) 680-9781, on Target Phone I. SANCHEZ stated to JONES "I need four times, bro". SANCHEZ then asked JONES "you gonna have them with you"? JONES stated that he would. JONES then asked SANCHEZ, "sure that you want them, right"? SANCHEZ replied "yeah". Affiant believes that SANCHEZ was requesting to receive a quantity of heroin from JONES.

303. On August 14, 2002, at 2:35 p.m., JONES received a call from SANCHEZ at (773) 680-9781, on Target Phone I. During that conversation, JONES and SANCHEZ are making arrangements to meet in the area of Cicero and Fullerton in Chicago, Illinois. JONES asked SANCHEZ if he had "the money". SANCHEZ told JONES, "nah, I'm gonna to flip it". It is understood by agents and officers that JONES was asking SANCHEZ if he had the money to pay for the heroin. It is also understood that when SANCHEZ said that he was going to "flip it", he was referring to taking the heroin and selling it for a profit and then paying JONES from the proceeds.

304. On August 21, 2002, at approximately 12:27 a.m., JONES received a call from SANCHEZ on Target Phone I. During that conversation, SANCHEZ stated "sorry to call you so late dog,...man, I got...I got bad news, real bad". JONES asked SANCHEZ what had happened. SANCHEZ stated, "I think we've been opened. Don't...don't get all...over nothing, man. Just be careful, on the look out, I mean they raided my sister-in-law, dog, they took my brother-in-law". JONES asked SANCHEZ "why"? SANCHEZ stated "they found that shit, bro". SANCHEZ continued to state, "he threw that shit out the window and fucking 5-0 shook the tree and found a lot...I don't know what they found". JONES asked SANCHEZ who the police were looking for, SANCHEZ said that the police were looking for his sister-in-law. JONES then stated "see, and you showed her where I stay at". JONES stated "Mikey, man, you better handle this, bro". SANCHEZ

stated that he would "handle it".

305. On September 1, 2002, at approximately 5:13 p.m., Kelly JONES received a call on **Target Phone I** from "MIKEY". During this conversation, MIKEY told JONES, "I got a little something for you . . ." [referring to money]. MIKEY further stated that his "guy is coming from, from the, from the burbs". MIKEY stated that whenever JONES was ready he (MIKEY) would "give you some money and you know get them four [quantity of drugs] for him [the individual from the "burbs"]". JONES agreed and advised MIKEY to get the money first and MIKEY agreed. JONES informed MIKEY that he (JONES) would be available to meet after 7:00 p.m.

306. On October 16, 2002, at approximately 5:39 p.m., KELLY JONES received a call on **Target Phone I** from "MIKEY" (MIGUEL SANCHEZ) at (773) 680-9781. During this call, SANCHEZ told JONES that he (SANCHEZ) "needs another bag, another twenty-five, two, bro" [quantity of heroin]. SANCHEZ then stated to JONES, "he [SANCHEZ' drug customer] got this for right now then ah, he [SANCHEZ' drug customer] wanna go turn this around right quick and get this other twenty-five [quantity of heroin]". JONES then stated "all right, well where are you at"?

307. On October 16, 2002, at approximately 7:55 p.m., KELLY JONES received another call from SANCHEZ on **Target Phone I**. During that call, JONES asked SANCHEZ if "you got the loot already" [money to buy heroin from JONES]? SANCHEZ replied that "yeah, I got the

loot for this twenty-five [quantity of heroin]."

MILENA P. PUPO aka "Paisa" and "Paisita"

308. On July 16, 2002, at approximately 7:40 p.m., LUCHO using **Target Phone V** called KELLY JONES on **Target Phone III**. LUCHO stated that "LA PIASITA" [PUPO] would contact JONES regarding the "1" [heroin quantity]. JONES agreed and stated that he would stop by tomorrow with the "papers" [money]. LUCHO agreed and provided the telephone number 551-5017 for "PIASITA" [PUPO].

309. On July 17, 2002, at approximately 4:44 p.m., LUCHO using **Target Phone IV** called KELLY JONES on **Target Phone III**. JONES asked what happened with "PIASA" [PUPO]. LUCHO asked JONES if JONES had talked to her. JONES stated that he did not and that "JOTA" [VALENCIA] told him (JONES) when she (PIASA) comes up with the money [for the heroin], then JONES can give her "that" [heroin].⁴⁷ JONES continued "if there's no money [paid up front], there's nothing [no heroin given to PIASA]". JONES stated that he needed the money for tomorrow⁴⁸ but added that he had some right

⁴⁷As discussed earlier, on or about July 17, 2002, at approximately 3:32 a.m., DAVID ACEVEDO and ANGEL MELENDEZ, JR. returned from their drug-related trip to New York to pick up heroin. Surveillance agents/officers observed KELLY JONES' white Nissan Altima parked in front of KELLY JONES' residence at 1433 W. Warner, Chicago, Illinois. Surveillance observed DAVID ACEVEDO walking to the residence carrying a bag over his shoulder and ANGEL MELENDEZ, JR. following ACEVEDO into the residence. At approximately 3:58 a.m., surveillance observed ACEVEDO, MELENDEZ, and MARCUS JONES exiting the residence and leaving the area.

⁴⁸Later on that same day, at approximately 1:12 p.m., KELLY JONES using **Target Phone III** called VALENCIA, in which they

now. JONES stated that he had "1500" [quantity of heroin] and asked LUCHO if he needed "some" [heroin]. LUCHO stated that he did not have anything at present and that he was going to talk to "him" [VALENCIA]. LUCHO also stated "let's wait for 'PIASITA' [PUPO] to pay", and JONES agreed.

310. On August 4, 2002, at approximately 6:39 p.m., KELLY JONES using **Target Phone III** called LUCHO at **Target Phone IV**. During this conversation, JONES asked LUCHO what was going on with "PIASITA" [PUPO] and LUCHO told JONES that he (LUCHO) had given one (1) [heroin quantity] to her (PUPO) on Friday [possibly August 2, 2002] and that she (PUPO) had passed [given] him (LUCHO) some receipts [money quantity]. LUCHO also told JONES that he needed to speak with CONSUEGRA to find out how much he (CONSUEGRA) needed [of heroin quantity].

311. On June 15, 2002, at approximately 2:42 p.m., VALENCIA called KELLY JONES on **Target Phone I**. During this conversation, JONES advised VALENCIA that he took care of CONSUEGRA with 200 [quantity of heroin] and that LUCHO wanted 300 [quantity of heroin], one [heroin quantity] for NEGRA [VELAZQUEZ] and two [heroin quantity] for PIASA [PUPO].

discuss sending the couriers back to New York for another pick up of heroin the next day (July 18). VALENCIA told KELLY JONES that he (VALENCIA) would call LUCHO and LA PIASA [PUPO] regarding giving JONES money to bring to New York [via the drug couriers the next day]. Subsequent intercepted calls between KELLY JONES and ANGEL MELENDEZ, JR. and DANIEL MALDONADO on July 17 and 18, 2002, indicate that another trip was being planned for July 18.

312. On August 15, 2002, at approximately 2:45 p.m., LUCHO received an incoming call on **Target Phone IV** from (773) 610-2229. LUCHO spoke with an individual he identified as "PAISA" (PUPO). PUPO asked LUCHO where he was, to which he responded that he was on Montrose sending some mail. PUPO asked if LUCHO would meet her. LUCHO asked for what and PUPO responded "It's good news for you". LUCHO and PUPO agreed to meet at an unidentified gas station in the vicinity of Touhy Avenue. PUPO stated that she needed to meet LUCHO so "we can check the accounts and everything else". LUCHO stated that he would meet PUPO approximately forty-five minutes later. Based on subsequent surveillance and an intercepted conversation between LUCHO and VALENCIA described below, Affiant believes PUPO wanted to meet with LUCHO to give him \$11,860 in drug proceeds.

313. On August 15, 2002, at approximately 3:00 p.m., surveillance units drove to the vicinity of the United States Post Office located at 2011 W. Montrose. Surveillance units observed a vehicle known to be utilized by LUCHO parked at the corner of West Montrose and Damen Avenue. LUCHO was later observed entering this vehicle and departing the area. Surveillance units continued to follow LUCHO and observed him park his vehicle near the intersection of North Coyle and West Campbell. At approximately 3:45 p.m., surveillance units observed LUCHO exit his vehicle and enter the passenger side of a vehicle occupied by an individual later identified as PUPO. Surveillance units observed PUPO exit

her vehicle and open the trunk. PUPO then reentered her vehicle. At approximately 3:57 p.m., LUCHO exited PUPO's vehicle, reentered his vehicle, and departed the area. PUPO also departed the area in her vehicle.

314. On August 15, 2002, at approximately 4:39 p.m., LUCHO received a call on **Target Phone IV** from James VALENCIA from an unidentified telephone number. During this conversation, LUCHO stated that "Paisa" (PUPO) called him (LUCHO) and gave him "eleven thousand eight sixty" (11,860) [currency].

315. On September 1, 2002, at approximately 2:03 p.m., KELLY JONES received a call on **Target Phone III** from MILENA PUPO. During this conversation, JONES asked PUPO "what are you looking for"? PUPO informed JONES "not much, maybe like five hundred dollars" [quantity of drugs].

316. On September 1, 2002, at approximately 2:04 p.m., KELLY JONES received a call on **Target Phone III** from PUPO. During this conversation, JONES asked PUPO, "when do you need it"? PUPO stated "tonight". JONES stated that "we could probably do this tonight. That would be no problem". PUPO asked JONES, "do you know what's J's [JAMES VALENCIA] number? I need to talk to him". JONES told PUPO, "439-1876".

317. On September 15, 2002, at approximately 9:56 P.M., LUCHO received a call on **Target Phone VI** from an unidentified telephone number, and spoke with JAMES VALENCIA. VALENCIA stated that was

"here [in Colombia] with 'Paisita' [MILENA PUPO]". PUPO could be heard in the background stating "I gave him (LUCHO) the twelve(12), eight(8), sixty(60) [quantity of money]". Affiant believes PUPO traveled to Colombia to meet with VALENCIA in order to discuss discrepancies related to her payment of money for heroin quantities received.

318. On September 15, 2002, at approximately 9:59 P.M., LUCHO placed a call from **Target Phone VI** to 011573104216075, an international number, and spoke with PUPO. PUPO stated that there were "2 pesitas" [quantity of money] that she gave LUCHO that she never "wrote down". PUPO asked if LUCHO remembered the time they met on Touhy and Western Avenues when PUPO told LUCHO there were "3,800" [quantity of money] and another amount in another bag. PUPO stated that she didn't write it down at the time and asked if LUCHO remembered how much it was. LUCHO responded it was "three(3) and seven(7)" [quantity of money] and "like six(6) something or seven(7)" [quantity of money]. LUCHO stated that he didn't have the "receipts" [transaction records] anymore that they were "stored in another car". PUPO continued that there was another time that she did not have written down and that she remembered it was "eleven(11), eight(8), sixty(60)" [quantity of money]. PUPO also mentioned that "Luis" [RIVERA] gave LUCHO "15" [quantity of money]. PUPO asked if LUCHO had "gone out with Luis" or "given him anything" [delivered heroin to RIVERA]. LUCHO stated that he had

not. PUPO asked if LUCHO gave RIVERA "100 pesos" [heroin quantity]. LUCHO stated that "Kelly" [JONES] gave him "that" but that RIVERA was going to give it back because JONES took two days to deliver it and then the "client" [customer of RIVERA] did not want it. PUPO asked "besides the '26' [quantity of money] and the '18' [quantity of money], has he (RIVERA) given you (LUCHO) anything else". LUCHO stated that the last thing "he" [RIVERA] gave him was "18" [quantity of money]. LUCHO continued "he [RIVERA] told me there were '18', I counted the money separately and there were '17' [quantity of money]".

LUIS E. RIVERA aka "Tito"

319. On September 11, 2002, at approximately 10:19 a.m., LUCHO placed a call on **Target Phone VI** to JAMES VALENCIA. LUCHO stated that he spoke with "Paisa's husband" [Luis RIVERA] yesterday, but he didn't give me that money [narcotics-related debt]". LUCHO stated that he was going to RIVERA's office at twelve (12:00).

320. On September 11, 2002, at approximately 12:15 p.m., surveillance units in the area of The House of Gift Baskets and Mini Mart, located at 3827 N. Lincoln, observed Luis RIVERA arrive at the store. RIVERA appeared to be bringing supplies into the store from a Grey in color Chevrolet Blazer.

321. On September 11, 2002, at approximately 12:16 p.m., KELLY JONES placed a call on **Target Phone III** to LUCHO. LUCHO asked if JONES had "something" [heroin quantity]. JONES stated that he had

"1,500" [heroin quantity]. LUCHO then stated that he was going to talk to "Paisita" [MILENA PUPO] to see if he (LUCHO) could pass at least "1,000" [heroin quantity] to her. LUCHO continued that if "Paisita" [Pupo] gives him the money [drug debt owed], "then we'll give her the . . ." [deliver a quantity of heroin].

322. On September 11, 2002, at approximately 12:50 p.m., surveillance units observed LUCHO arrive in the vicinity of 3727 N. Lincoln Ave., Chicago, IL. LUCHO parked the Gold Sebring in a parking lot at the intersection of Berenice and Lincoln Avenue. LUCHO then proceeded to walk over across the street to The House of Gift Baskets and Mini Mart. LUCHO then entered the store. According to surveillance agents, LUCHO and RIVERA were believed to be the only individuals inside the store. At approximately 12:55 p.m., LUCHO exited the store carrying a small black bag in his hand and departed the area.

323. On September 11, 2002, at approximately 2:56 p.m., KELLY JONES using **Target Phone III** called LUCHO. LUCHO told JONES that he needed JONES to give "a check of one thousand (1,000) dollars" [heroin quantity] to "Paisita" [MILENA PUPO]. JONES asked if he should give it to LUCHO or directly to "them" [PUPO and Luis RIVERA]. LUCHO stated that JONES could give it to him (LUCHO) or directly to them [PUPO and LUIS RIVERA]. LUCHO told JONES that "they" [PUPO and RIVERA] would not get "anything" [heroin quantity] until they gave him "the money" [paid their drug debt]. LUCHO

stated that he was going to meet "them" [PUPO and/or RIVERA] between 3:00 and 3:30 P.M.

324. On September 11, 2002 at approximately 5:05 p.m., KELLY JONES using **Target Phone III** called LUCHO. LUCHO stated that "he [RIVERA] already gave me the receipts".

326. On September 13, 2002, at approximately 10:19 a.m., LUCHO received a call on **Target Phone VI** from Luis RIVERA. LUCHO stated that he "counted that personally" [the money that LUCHO picked-up from RIVERA] and that "it wasn't eighteen (18) [quantity of money], there were seventeen (17) [quantity of money]".

327. On September 14, 2002, at approximately 2:44 p.m., LUCHO received a call on **Target Phone VI** from JONES. LUCHO told JONES that "Paisa's husband" (RIVERA) is going to return the check for "100" [heroin quantity] because he lost the customer and couldn't sell it".

328. On September 23, 2002, at approximately 2:48 p.m., LUCHO received a call on **Target Phone VI** from (773) 677-6119. LUCHO spoke with LUIS RIVERA and told him that he (LUCHO) talked to "Jotita" (VALENCIA), who said that "until you (RIVERA) get things going, you cannot go out to breakfast [until RIVERA pays his debts, he would not receive any more heroin]". RIVERA stated that he had another "seven (7) pesitos" [quantity of money] if LUCHO could come by and get it.

329. On September 29, 2002, at approximately 5:22 p.m., LUCHO

received a call on **Target Phone VI** from (773) 677-6119, and spoke with LUIS RIVERA. RIVERA asked LUCHO if they could meet that night. LUCHO stated that he could not because the "boys just got here" [heroin courier arrived in Chicago]. LUCHO asked RIVERA how much [heroin quantity] he needed. RIVERA stated that he needed "fifteen" [heroin quantity].

330. On September 29, 2002, at approximately 3:15 P.M., LUCHO received a call on **Target Phone VI** from Luis RIVERA at (773) 677-6119. RIVERA asked if LUCHO was coming to see him that night. LUCHO said he could not because the "muchachitos" [couriers] just arrived. LUCHO asked how much RIVERA needed. RIVERA stated "15" [heroin quantity].

331. On October 2, 2002, at approximately 4:24 P.M., LUCHO received a call on **Target Phone VI** from RIVERA at (773) 551-5017. RIVERA asked LUCHO for "200 pesos" [heroin quantity] that he needed for "the rent". LUCHO stated that his "calculator" [possibly a scale] didn't work and that he needed to buy a new one. RIVERA said that he was at "the store" [The House of Gift Baskets and Mini Mart, located at 3827 N. Lincoln Avenue or DC Communications, located at 7213 N. Western Avenue] if LUCHO wanted to meet. LUCHO stated that he was going to buy the "calculator" and then "come by there" [meet at RIVERA's store].

332. On October 4, 2002, at approximately 9:41 A.M., LUCHO received a call on **Target Phone VI** from RIVERA at (773) 551-5017.

LUCHO stated that some "T-shirts" [heroin quantity] had arrived. LUCHO added that they arrived "wrinkled" [not ready for distribution]. RIVERA stated that he thought he could receive them "just like that". RIVERA stated that he would "call first and I'll call you back" [RIVERA needed to call the customer to verify that he could deliver the heroin quantity as is]. LUCHO asked how many "T-shirts". RIVERA stated "3" [heroin quantity].

333. On October 4, 2002, at approximately 6:29 P.M., LUCHO received a call on **Target Phone VI** from RIVERA at (773) 551-5017. LUCHO stated that he was "ironing clothes" and that he didn't think he could meet RIVERA that night. LUCHO stated that he would "lend" RIVERA "the five CD's" [heroin quantity]. RIVERA asked if LUCHO could "lend" him "one dollar" [heroin quantity]. LUCHO stated that he would talk with his "father" [VALENCIA].

334. On October 5, 2002, at approximately 10:14 A.M., LUCHO placed a call from **Target Phone VI** and spoke with VALENCIA. LUCHO stated that "Paisa's husband" [RIVERA] wanted a "full CD" [heroin quantity]. VALENCIA asked "for money or what" to which LUCHO responded that RIVERA may have "a few receipts" [quantity of money]. VALENCIA then stated "Okay then, but tell him to behave, we're giving it to him but to behave . . .".

335. On October 5, 2002, at approximately 3:17 P.M., LUCHO received a call on **Target Phone VI** from RIVERA at (773) 551-5017. RIVERA asked LUCHO not to forget to "separate the food" [package

the heroin a certain way]. RIVERA told LUCHO to "separate the five (5) songs and the rest of it in small ones of one hundreds (100's)".

JUAN LOZADA aka "Mono", "Monito" and "Pablito"

340. On August 19, 2002, at approximately 12:23 p.m., LUCHO received a call on **Target Phone IV** from Individual M. During this conversation, LUCHO and Individual M agreed to meet at a car wash near Magnum [Magnum Insurance]. Individual M agreed to call LUCHO at approximately 2:30 p.m. Individual M asked LUCHO to bring one hundred (100) "pesitos" [heroin quantity] for him. Individual M then passed the phone to an individual believed to be JUAN LOZADA. LOZADA and LUCHO then began a conversation. LUCHO stated that he could meet at approximately 3:00 p.m. LOZADA stated that Individual M needed one hundred (100) [heroin quantity] but he (LOZADA) needed twenty-five (25) "pesitos" [heroin quantity]. LUCHO agreed and asked if it was twenty-five (25) "little ones" [heroin quantity]. LOZADA said that it was and asked LUCHO to keep them separated if he could.

341. On August 19, 2002, at approximately 3:21 p.m., surveillance units in the area of the 4300 block of North Western Avenue observed LUCHO driving southbound on Western in the previously identified Chrysler Sebring. LUCHO proceeded to park in the rear of the Magnum Insurance company building.

342. On August 19, 2002, at approximately 3:24 p.m., LUCHO

placed a call from **Target Phone IV** to (773) 793-9169. LUCHO spoke with Individual M, stated that he was in the alley by the car wash, and asked where Individual M was. Individual M stated that he was across the street from the insurance place. LUCHO stated that they should meet at another location. Individual M agreed and said that he would follow LUCHO.

343. On August 19, 2002, at approximately 3:22 p.m., surveillance units observed LUCHO walking Eastbound on Cullom from Western carrying a small plastic bag in his hand. Surveillance units also observed a silver colored Mercedes Benz in the immediate area of LUCHO. Surveillance units observed an unidentified male exit the passenger seat of the Mercedes. Both LUCHO and the unidentified male walked Eastbound on Collum. At approximately 3:23 p.m., surveillance units observed the plastic bag that LUCHO was carrying being given to the unidentified male. This individual then returned to the passenger side of the Mercedes Benz and entered the vehicle.

344. On August 20, 2002, at approximately 3:01 p.m., LUCHO received a call on **Target Phone IV** from (773) 983-4116. LUCHO had a conversation with an individual known as "Mono" or "Monito" (believed to be Juan Pablo LOZADA). LOZADA stated that he had the receipt for "ten (10), the money order" [quantity of drug money]. LUCHO and LOZADA agreed to meet at approximately 5:00 p.m.

345. On August 20, 2002, at approximately 6:29 p.m., LUCHO

received a call on **Target Phone IV** from LOZADA at (773) 983-4116. LOZADA stated that he was at the Wendy's near Addison. LUCHO stated that he would arrive in ten (10) minutes.

346. On August 20, 2002, at approximately 6:51 p.m., LUCHO placed a call on **Target Phone IV** to LOZADA at (773) 983-4116. LOZADA stated that he was at 3626 N. Western.

347. On August 20, 2002, at approximately 6:53 p.m., surveillance units observed a Chrysler Sebring previously utilized by LUCHO parked next to a black Nissan Altima in the Wendy's parking lot on the 3600 block of North Western Avenue. An unidentified male was observed standing between the two vehicles and appeared to be speaking with the driver of the Sebring (LUCHO). Shortly thereafter, the unidentified male entered the Nissan Altima and both vehicles departed the area. At approximately 7:50 p.m., Chicago Police Department personnel initiated a traffic stop of the vehicle for an observed traffic violation. The driver of the Nissan Altima, who was earlier observed meeting with LUCHO, was identified as Juan P. LOZADA.

348. On September 17, 2002, at approximately 12:22 P.M., LUCHO received a call on **Target Phone VII** from LOZADA. LOZADA and LUCHO agreed to meet later in the day to compare LOZADA's "account" [narcotics-related ledger]. LOZADA wanted to meet so that he could "square things away with him [VALENCIA] because he's calling me".

349. On September 17, 2002, at approximately 5:56 P.M., LUCHO

received a call on **Target Phone VII** from LOZADA. LUCHO stated that he was on his way to "Llano" [El Llano restaurant]. LUCHO stated that he had "the little notes" [narcotics-related ledger]. LOZADA agreed to meet LUCHO.

350. On September 17, 2002, at approximately 6:20 P.M., surveillance units in the area of El Llano restaurant observed LUCHO's vehicle in the area. At approximately 6:45 P.M., LUCHO was observed leaving the restaurant. At approximately 6:46 P.M., surveillance units observed LOZADA walk to and enter a black Nissan Altima bearing Illinois license plate number 3936333 and depart the area.

351. On September 17, 2002, at approximately 6:54 P.M., LUCHO received a call on **Target Phone VII** from LOZADA. LOZADA stated that he was lent "100 dollars" [heroin quantity] and that "it's fucking stuck together". LOZADA further stated that "it's a mess and I need to iron it" [heroin quantity is not ready for distribution]. LUCHO stated "ironing 100 pesos is a hard thing to do" [preparing that quantity of heroin for distribution is difficult].

352. On September 24, 2002, at approximately 1:14 p.m., LUCHO received a call on **Target Phone VI** from (773) 425-0493. LUCHO spoke with "Mono" (Juan P. LOZADA) and told him that he (LUCHO) had "five (5) pesitos" [quantity of heroin] for him. LUCHO said that JONES stopped by the night before. LOZADA said that he already met

with JONES and that he got "some" [quantity of heroin] from JONES. LUCHO explained to LOZADA that JONES gave him (LUCHO) "one (1) of the one, three (1.3)" [heroin quantity] that he asked JONES for. LOZADA states that he told JONES to let LUCHO know about the "things" [heroin quantities] that he (LOZADA) got from JONES.

SANDRA P. VELAZQUEZ aka "La Negra" and "Negrita"

353. As discussed earlier, on June 15, 2002, at approximately 2:42 p.m., VALENCIA called KELLY JONES on **Target Phone I**. During this conversation, JONES advised VALENCIA that he took care of CONSUEGRA with 200 [quantity of heroin] and that LUCHO wanted 300 [quantity of heroin], one [heroin quantity] for NEGRA [VELAZQUEZ] and two [heroin quantity] for PIASA [PUPO].

354. On September 2, 2002, at approximately 9:33 A.M., LUCHO received a call on **Target Phone VII** from "Negrita" (Sandra P. VELASQUEZ). LUCHO stated that he had some "clothes" [heroin quantity] for her. VELAZQUEZ asked where they could meet. LUCHO and VELAZQUEZ agreed to meet at approximately 12:00 P.M. "by the lady, the Puerto Rican lady" [TORRES].

355. On September 2, 2002, at approximately 10:45 A.M., surveillance was set up in the vicinity of 4715 W. McLean in Chicago. Surveillance units observed LUCHO's vehicle parked in the alley beside the residence. At approximately 11:50 A.M., surveillance units observed a silver Toyota truck bearing Illinois license plate 3455589 arrive at 4715 W. McLean. VELAZQUEZ walked

to the side alley entrance to 4715 W. McLean and appeared to be talking to someone at the door. VELAZQUEZ then entered the 4715 W. McLean.

356. On October 2, 2002, at approximately 11:52 A.M., LUCHO placed a call from **Target Phone VI** and spoke with JAMES VALENCIA. LUCHO stated that he spoke with "Negrita" [VELAZQUEZ] and was going to meet her over "here" [4715 W. McLean] at 12:00 P.M.

357. On October 2, 2002, at approximately 12:00 P.M., LUCHO exited the side entrance and he walked to the back of his vehicle. LUCHO entered the trunk area and removed a bag. LUCHO walked to the driver's side and placed the bag in the car. LUCHO began examining his vehicle. LUCHO opened the hood of the car and appeared to be looking around the engine compartment. At approximately 12:05 P.M., LUCHO closed the hood of the car. LUCHO walked and removed the bag from the driver's side of the car and re-entered the side entrance to 4715 W. McLean. At approximately 12:25 P.M., LUCHO exited the residence and walked to the front of 4715 W. McLean to the silver Toyota. LUCHO entered the driver's side of the Toyota. Surveillance observed LUCHO remove a plastic bag from the Toyota 4x4. At that point, LUCHO re-entered the residence. At approximately 12:28 P.M., LUCHO exited the residence and placed something in his trunk. LUCHO re-entered the residence.

358. On October 2, 2002, at approximately 12:34 P.M., LUCHO placed a call from **Target Phone VI** and spoke with VALENCIA. LUCHO

stated that he talked with "Negrita" [VELAZQUEZ]. VALENCIA asked what she said. LUCHO responded "84 receipts" [quantity of money]. VALENCIA told LUCHO to give "50" [quantity of money] to "Comadre" [HERNANDEZ].

359. On October 2, 2002, at approximately 12:43 P.M., VELAZQUEZ exited the residence carrying a plastic bag, which appeared to be the same style of bag LUCHO had earlier removed from the Toyota. Shortly thereafter, VELAZQUEZ entered the Toyota and departed the area.

COSME CHACON aka "Meno" and "Nano" and VIVIANA HERNANDEZ

360. On September 12, 2002 at approximately 6:26 P.M., LUCHO placed a call from Target Phone VI to JAMES VALENCIA at 011573104216075. LUCHO stated "I picked 60 [money quantity] up for you from 'Consu' [CONSUEGRA]". VALENCIA told LUCHO to put "50" [quantity of money] aside for "Mono" and to take the "rest" [quantity of money] to "Nano" [CHACON].

361. On September 12, 2002, at approximately 6:46 P.M., LUCHO placed a call from Target Phone VI to JAMES VALENCIA at 011573104216075. LUCHO stated that he was going to give "40" [money quantity] to "Nanito" [CHACON].

362. On September 12, 2002, at approximately 7:11 P.M., LUCHO placed a call from Target Phone VI to (773) 851-3021. LUCHO reached the voicemail message for this phone, which stated "You have reached Cosme, please leave your message at the tone". LUCHO

stated "I have the receipts [quantity of money] here in your office, but I'll have to come back because the girl who always opens the office for me is not here".

363. On September 12, 2002, at approximately 7:13 P.M., LUCHO placed a call from Target Phone VI to VALENCIA. LUCHO asked VALENCIA if he (VALENCIA) spoke with "Cosme" [CHACON] or "comadre" [Viviana HERNANDEZ]. LUCHO stated that he went to the "office" [Covitel wire remitter] and the "other" receptionist was there, "the new one". LUCHO continued that she doesn't have the keys to the office, "otherwise I would have been able to lock it [quantity of money] up in the office". VALENCIA stated that he would call "her" [HERNANDEZ] and let her know that LUCHO was at the office. LUCHO stated that he had been trying to call CHACON but only reached the voicemail. VALENCIA stated that "Cosme" [CHACON] is "here" [in Colombia] and that he would tell "her" [HERNANDEZ] that LUCHO was at the office. LUCHO stated that he would wait at the office.

364. On September 12, 2002, at approximately 8:19 P.M., LUCHO placed a call from Target Phone VI to VALENCIA. LUCHO stated that he "dropped-off the 40" [delivered a quantity of money] for VALENCIA and that "she" [HERNANDEZ] was going to "check that it's all there" [verify the amount of money]. LUCHO continued that when "she" [HERNANDEZ] counts the "money" the following day, "she" [HERNANDEZ] would tell LUCHO how much is missing because LUCHO

didn't have time to count the money.

365. On October 5, 2002, at approximately 1:09 A.M., JONES received a call on Target Phone I from an unidentified number and spoke with JAMES VALENCIA. JONES stated that he was on his way home [from Detroit]. VALENCIA told JONES to see "Nano" [CHACONE] the next day and asked JONES how much he had. JONES stated "66" [quantity of money]. VALENCIA then told JONES to bring "16" to "Nano" [CHACONE].

366. On October 5, 2002, at approximately 1:27 P.M., JONES placed a call on Target Phone I to DANIEL MALDONADO and DAVID ACEVEDO at (773) 895-1206. JONES told MALDONADO that he was "heading out south right now by the laundromat [Covitel wire remitter business]." JONES stated that he was going to "handle some business".

367. On October 5, 2002, at approximately 1:45 P.M., surveillance units observed KELLY JONES arrive at COVITEL, a wire remitter business located at 1842 W. Blue Island, Chicago, Illinois. Agents observed JONES exit the Navigator and remove a black bag from the back seat of the vehicle. JONES entered COVITEL only to quickly exit and return to the Navigator. JONES departed the area in the Navigator. At approximately 1:52 P.M., agents observed the Navigator return to COVITEL and JONES exit the vehicle with the black bag. Due to traffic, Agents were unable to maintain surveillance of JONES.

368. On October 5, 2002, at approximately 2:01 P.M., JONES placed a call on Target Phone I to MORCIGLIO at (847) 530-0014. JONES stated that he was waiting and "this lady" [HERNANDEZ] would be coming in twenty minutes. JONES stated that he had a "fifty pack" [quantity of money] with him. JONES stated that he had to wait twenty minutes and added "I know this bitch by, all the way by her house, that's like 95th and Harlem". JONES later added that he "got all this loot, sixty-four stacks out here [quantity of money]."

369. On October 5, 2002, at approximately 2:20 P.M., agents observed JONES arrive at COVITEL and park just southwest of the business on the West side of Blue Island. JONES did not immediately exit the vehicle. At approximately 2:40 P.M., agents observed a White Ford Navigator, Bearing Illinois License Plate 3079420, park next to the Lincoln Navigator. Two females exited the vehicle. One of the females was identified as Viviana HERNANDEZ. JONES exited the Navigator with the black bag and entered COVITEL with HERNANDEZ. At approximately 3:00 P.M., JONES exited COVITEL carrying the previously observed black bag. JONES entered the Navigator and departed the area.

370. The premises to be searched is the residence of KELLY JONES located at 1433 W. Warner, Unit #2, Chicago, Illinois. According to COMED records, the utility subscriber to this address is Individual B, who based on surveillance and intercepted

telephone calls is the live-in girlfriend of JONES. On multiple occasions during the investigation, surveillance agents have observed JONES enter the door directly beneath the number "1433." NATHAN THOMAS had informed Customs during the period of his cooperation that entrance to JONES' residence could be gained by entering the front door of the building and then entering the door on the immediate left (east-inner side), and going up the stairway. This information is consistent with surveillance agents observations during this investigation, that JONES enters the front main door, and then turns left. During an intercepted call over Target Phone I on October 29, 2002 at approximately 11:01 a.m., KELLY JONES told DANIEL MALDONADO that JONES was at the "lab" and that there was some kind of emergency. JONES said that "dude [VALENCIA] came in with all these problems... all these people are returning the stuff....so we've got a bunch of soldiers, so it shouldn't take long." During the morning of October 29, 2002, surveillance agents observed VALENCIA, JONES, JIRON, MORCIGLIO, ROLDAN, MALDANDO arrive at various times at JONES's residence at 1433 W.Warner.

371. Based on my experience and the experience of other agents, drug traffickers commonly keep books, records, receipts, notes, ledgers, airline tickets, money orders, and other papers relating to the transportation, purchase, packaging, sale, and distribution of controlled substances. They also maintain books,

papers, and documents that reflect names, addresses, and/or telephone numbers of their suppliers, couriers, customers, and other associates in the drug trafficking organization. Many of these items may be maintained in either paper form or on computers, computer disks, CD-Rom disks, and related equipment. These documents are commonly maintained where the drug traffickers have ready access to them, such as in homes, offices, and automobiles.

Drug traffickers commonly hide contraband, proceeds of drug sales, and records of drug transactions, drug sources, and drug customers, in secure locations within their residences, offices, garages, storage buildings, vehicles, and safe deposit boxes for ready access, and also to conceal such items from law enforcement authorities.

Drug traffickers commonly keep large amounts of United States currency at their disposal in order to maintain and finance an ongoing drug business.

Drug traffickers conceal in their residences and/or places of business the proceeds of their illegal activity, including large amounts of United States currency, financial instruments, precious metals, jewelry, rare coins, works of art, and other items of value, as well as books and records regarding the acquisition, use, and disposition of such items of value.

When drug traffickers amass large proceeds from the sale of drugs, they attempt to legitimize these profits, often by using the

services of foreign and domestic banks, other financial institutions, and real estate brokers, and that books and papers related to such efforts, including, but not limited to, cashier's checks, money orders, telegrams, telexes, letters of credit, and ledgers, are maintained in their residences and/or places of business.

Drug traffickers usually keep paraphernalia related to the packaging, cutting, weighing, and distribution of drugs, including, but not limited to, scales, plastic bags, sifters, strainers, spoons, cutting agents, and money counting machines, and that such paraphernalia is often secreted or stored in their residences and/or places of business.

Drug traffickers frequently take, or cause to be taken, photographs of themselves, their associates in the drug trade, property acquired from the distribution of drugs, and their product, and that such photographs are often kept in their residences and/or places of business.

Drug traffickers very often place assets, including real and personal property, such as vehicles, in different names to avoid detection and forfeiture of such assets by government agencies, and that the drug traffickers continue to use these assets and to exercise dominion and control over them even though the assets are nominally owned by others

Drug traffickers often possess weapons, including firearms for

protection.


Drug traffickers often use cellular phones and pagers to conduct their business.

372. Because of the ongoing and undercover nature of the investigation and the need for allowing flexibility in arresting the individual defendants named herein, along with executing the search warrant at or around the time that KELLY JONES residing at is arrested, the search warrant requests permission to execute the warrant at any time in the day or night. This is necessary in order to ensure that evidence is not destroyed if the individuals are arrested during the evening hours.


373. Based on my training and experience, and based on the information contained in paragraphs 298 and 300, I believe that announcing law enforcement's presence prior to the execution of the arrest warrant for RICARDO ARNOLD would result in the destruction of evidence and would endanger law enforcement officers executing the warrant.

374. Based on the foregoing, I believe there is probable cause to support the requested criminal complaint and search warrant.

FURTHER AFFIANT SAYETH NOT.


Colberd Almeida
Special Agent, Customs

SUBSCRIBED AND SWORN TO BEFORE
ME THIS 29 TH DAY OF OCTOBER 2002.


GERALDINE SOAT BROWN
UNITED STATES MAGISTRATE JUDGE